

Pamela J. Schreiner

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1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF GEORGIA
3 ROME DIVISION

4 DAVID R. WILSON and CHARLENE)
5 WILSON,)
6 Plaintiffs,) No. 4:06-CV-179-HLM
7 -vs-)
8 TASER INTERNATIONAL, INC.,)
9 Defendant.)
10 _____)
11)
12)
13 DEPOSITION OF PAMELA J. SCHREINER
14)
15 Phoenix, Arizona
16 December 3, 2007
17)
18)
19)
20)
21)
22 Reported by:
23 PAUL GROSSMAN
24 Arizona Certified
25 Reporter #50028
CA CSR #1487

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<p style="text-align: right;">Page 6</p> <p>1 MR. REDHAIR: Mike Redhair on behalf of the 2 witness, Ms. Schreiner.</p> <p>3 MS. JOHNSON: I'm Cindy Johnson, attorney for 4 the plaintiffs Wilson.</p> <p>5 MR. BRAVE: Also present are Holly Gibeaut, 6 who is a litigation counsel for Taser and Scott Link who 7 is a corporate representative of Taser.</p> <p>8 PAMELA J. SCHREINER, 9 called as a witness herein, having been first duly 10 sworn, was examined and testified as follows:</p> <p>11</p> <p>12 EXAMINATION</p> <p>13 BY MR. BRAVE:</p> <p>14 Q. Ms. Schreiner, good morning. You've had your 15 deposition taken before?</p> <p>16 A. Yes, sir.</p> <p>17 Q. And also, if you haven't acquired it yet, 18 you're working towards being a paralegal if I remember 19 correctly?</p> <p>20 A. Yes, sir.</p> <p>21 Q. So you are familiar with the deposition 22 process?</p> <p>23 A. Yes, sir.</p> <p>24 Q. Do you believe it's necessary for me to go 25 through the usual deposition basics with you or are you</p>	<p style="text-align: right;">Page 8</p> <p>1 your ability?</p> <p>2 A. Yes.</p> <p>3 Q. In your opinion is a misstatement a 4 falsehood?</p> <p>5 A. Yes.</p> <p>6 Q. In your opinion is an embellishment of a 7 stated fact a falsehood?</p> <p>8 MS. JOHNSON: Object to the form.</p> <p>9 MR. REDHAIR: Join.</p> <p>10 MR. BRAVE: What is your objection?</p> <p>11 MS. JOHNSON: Vague.</p> <p>12 BY MR. BRAVE:</p> <p>13 Q. What would be your opinion -- in your opinion 14 would be the definition of an embellishment or an 15 exaggeration, either one?</p> <p>16 A. Well, an exaggeration to me is just that, 17 where someone is exaggerating the truth. They are not 18 speaking the full truth.</p> <p>19 Q. So if an exaggeration was made of a fact 20 would that be a falsehood?</p> <p>21 MR. REDHAIR: Object to the form.</p> <p>22 MS. JOHNSON: Objection. Speculation.</p> <p>23 THE WITNESS: Yes.</p> <p>24 BY MR. BRAVE:</p> <p>25 Q. Give you a hypothetical. Withdraw the</p>
<p style="text-align: right;">Page 7</p> <p>1 fully aware of those?</p> <p>2 A. No, I'm aware.</p> <p>3 MR. REDHAIR: Object to form.</p> <p>4 MR. BRAVE: What do you object to, what 5 aspect of the form?</p> <p>6 MR. REDHAIR: What is the basics of a 7 deposition? I mean, it's vague and confusing.</p> <p>8 BY MR. BRAVE:</p> <p>9 Q. Ms. Schreiner, what do you believe the basic 10 parameters of a deposition are?</p> <p>11 A. I believe it would be stating my name, my 12 address, my employment, information about me.</p> <p>13 Q. Anything else?</p> <p>14 A. No. That would be it for me.</p> <p>15 Q. Okay. Basically you're aware that you're 16 here and you're under oath?</p> <p>17 A. Yes.</p> <p>18 Q. And you're subject to the laws of perjury?</p> <p>19 A. Yes.</p> <p>20 Q. And you understand that so at least myself 21 and probably several of the people in the room will be 22 asking you questions?</p> <p>23 A. Yes.</p> <p>24 Q. And you understand that you're to answer 25 those questions honestly and truthfully to the best of</p>	<p style="text-align: right;">Page 9</p> <p>1 question.</p> <p>2 Here's a hypothetical. If the facts show as 3 an example that -- well, we'll use Taser and one of the 4 reasons we are here. If the facts were to show that 5 there were, for example, 100 injuries recorded in 6 Volunteer Exposure Reports but in a statement that was 7 made somebody said it was 200 or 300, would that be an 8 exaggeration?</p> <p>9 MS. JOHNSON: Objection. Vague and calls for 10 speculation.</p> <p>11 MR. REDHAIR: Join.</p> <p>12 MS. JOHNSON: I don't think it's a proper 13 question to ask a fact witness a hypothetical question.</p> <p>14 BY MR. BRAVE:</p> <p>15 Q. You can answer.</p> <p>16 A. I believe that in a -- if it's a hypothetical 17 question like that, I myself believe that if there's 100 18 injuries and that's what shows but there's actually 200 19 it's just not showing complete. It's not showing the 20 complete truth. To me, if it's supposed to be -- if 21 there's two or 300 injuries then that's what should be 22 reported.</p> <p>23 Q. So, therefore, you totally agree that it's 24 the accuracy, the accurate facts that should be stated, 25 correct?</p>

3 (Pages 6 to 9)

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<p style="text-align: right;">Page 10</p> <p>1 A. Yes.</p> <p>2 Q. Just real briefly when you first were brought 3 into Taser one of the assignments -- and I believe 4 you've already testified to this -- that Doug Clint gave 5 you was to accumulate all Volunteer Exposure Reports and 6 then have them made into PDFs and then provided in the 7 Powers case, is that correct?</p> <p>8 A. Yes.</p> <p>9 Q. And I believe you've already testified that's 10 to the best of your ability?</p> <p>11 A. Yes.</p> <p>12 Q. Were all of the exposure reports that you 13 found included in those PDFs that were provided in the 14 Powers case?</p> <p>15 A. To my knowledge, yes.</p> <p>16 Q. Do you have any reason to believe that they 17 weren't?</p> <p>18 A. The reason why I believe that they weren't 19 was because there was no uniform -- uniformity to 20 anything in there. You know, there were documents 21 scattered all throughout. Nothing was in a file. There 22 were -- you know, there were boxes upon boxes in 23 warehouses and then shoved in drawers and things like 24 that.</p> <p>25 Q. So, you believe, correct me if I'm wrong,</p>	<p style="text-align: right;">Page 12</p> <p>1 A. Of -- yes, 2004.</p> <p>2 Q. Did you diligently work on that spreadsheet?</p> <p>3 A. Yes, I did.</p> <p>4 Q. Did you complete that spreadsheet with the 5 Volunteer Exposure Reports that you had?</p> <p>6 A. Yes.</p> <p>7 Q. When did you last work on that spreadsheet?</p> <p>8 A. Probably mid to late fall.</p> <p>9 Q. When you last worked on that spreadsheet had 10 you completed the spreadsheet for the Volunteer Exposure 11 Reports with unknown dates that you had accumulated?</p> <p>12 A. I believe so. I don't recall what was 13 actually there but I believe I did.</p> <p>14 Q. Do you have any reason to believe that you 15 didn't?</p> <p>16 A. Just from, you know, lack of time of from 17 being there 'til now.</p> <p>18 Q. Did you complete the spreadsheet for the 19 Volunteer Exposure Reports that you had for the year 20 2000 as of the last time you worked on the spreadsheet?</p> <p>21 A. I don't recall that. I don't recall what the 22 time-frame was, what the dates were.</p> <p>23 Q. Do you recall that there were several 24 categories and do you recall those categories were 25 unknown because there was no date on the Volunteer</p>
<p style="text-align: right;">Page 11</p> <p>1 that basically you did do your best efforts to 2 accumulate all those that were there and you did put 3 them into the PDFs, correct?</p> <p>4 A. Correct.</p> <p>5 Q. And you have no reason to believe at that 6 point in time that there's any allegation that anyone 7 removed any of them, intentionally shredded them, et 8 cetera, correct?</p> <p>9 MR. REDHAIR: Objection.</p> <p>10 MS. JOHNSON: Objection.</p> <p>11 MR. REDHAIR: Object to form.</p> <p>12 BY MR. BRAVE:</p> <p>13 Q. You can answer.</p> <p>14 A. At that time, no.</p> <p>15 Q. Did Doug Clint also instruct you to do a 16 spreadsheet of those Volunteer Exposure Forms?</p> <p>17 A. At that particular time?</p> <p>18 Q. At any time.</p> <p>19 A. At one point, yes, but not at that time.</p> <p>20 Q. Do you recall when that -- when that time was 21 or an approximation of it?</p> <p>22 A. It was after the Powers case had started. It 23 was probably some time mid, mid summer, like early 24 summer time-frame.</p> <p>25 Q. Of 2004?</p>	<p style="text-align: right;">Page 13</p> <p>1 Exposure Forms --</p> <p>2 MS. JOHNSON: Objection.</p> <p>3 BY MR. BRAVE:</p> <p>4 Q. -- 2000, 2001, 2002 and 2003 and 2004? Do 5 you recall that?</p> <p>6 MR. REDHAIR: Object to form.</p> <p>7 MS. JOHNSON: Object. Compound and vague.</p> <p>8 BY MR. BRAVE:</p> <p>9 Q. You can answer.</p> <p>10 A. I don't recall what the dates were. I don't 11 recall, you know, the tabs. I remember that there were 12 some tabs on the spreadsheet or the worksheet, whatever 13 you want to call it, and they were for the different 14 types of forms because they had different forms 15 available to training and different things. But I don't 16 recall the dates. I'm sorry. I don't recall that.</p> <p>17 Q. And this was an Excel spreadsheet?</p> <p>18 A. Yes, it was.</p> <p>19 Q. Do you recall the file name of the 20 spreadsheet?</p> <p>21 A. No, I don't recall the name.</p> <p>22 Q. But you do recall the last time you worked on 23 that spreadsheet that all of the forms that you had 24 acquired and accumulated had been put onto that 25 spreadsheet, correct?</p>

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1 A. Yes.

2 MR. REDHAIR: You know, just for the record,
 3 could I make sure we're -- I'm operating under the right
 4 assumption.

5 In Arizona we object to simply form whether
 6 it's compound, argumentative, you know, whatever. So I
 7 just want to make sure that under the rule, or what
 8 state law applies here, but I just want to make sure
 9 that when I say "object to form" that's what we do in
 10 Arizona and if you, like you did earlier, if you want
 11 clarification on what the problem is or what I think the
 12 problem is I'd be happy to give it to you. I just --
 13 we're kind of speaking different languages and I just
 14 wanted to make sure that that was clarified.

15 MR. BRAVE: Two things. Number one, I fully
 16 understand that and agree.

17 Number two, also the two of you -- this is
 18 your call. If one of you makes an objection I have no
 19 problem with basically saying that applies to both of
 20 you automatically so you don't have to join.

21 MR. REDHAIR: Okay.

22 MR. BRAVE: If you want that. That's up to
 23 you.

24 Ms. JOHNSON: I don't think that would be
 25 proper.

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1 my understanding is that is not attorney-client
 2 privilege, that would have done away with any
 3 attorney-client privilege that would have been present.
 4 So I'm entitled to ask the question.

5 Q. So you can answer unless your attorney is
 6 going to instruct you not to.

7 MR. REDHAIR: Let me think about that for a
 8 minute. If we can come back to that. At this point I
 9 will instruct her not to. Let me think about that and
 10 if we can come back to that later on in the deposition I
 11 would appreciate that.

12 BY MR. BRAVE:

13 Q. At any point prior to -- at any point from
 14 October 18, 2007, your prior deposition, to today have
 15 you met with Ms. Johnson?

16 A. Other than today?

17 Q. Yes.

18 A. I met with her, yes.

19 Q. Other than today or today?

20 A. I met with her today.

21 Q. Did you have any communications with her from
 22 October 18th through right now other than this morning?

23 A. I did on the phone, yes.

24 Q. Tell me everything you can remember about
 25 that conversation?

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1 MR. BRAVE: Okay.

2 MS. JOHNSON: I don't represent the witness.

3 MR. BRAVE: Then the answer is no.

4 Q. Ms. Schreiner, you have an attorney here
 5 representing you today. When was the first time that
 6 you were in contact with him?

7 A. I actually spoke with him last week.

8 Q. Did you contact him directly?

9 A. I actually spoke with him directly, yes.

10 Q. Did anyone prompt you to contact him?

11 A. No.

12 Q. Did anyone suggest that you contact him?

13 A. No.

14 Q. Did anyone provide you with his name and/or
 15 phone number or any other information about him?

16 A. No.

17 Q. Did you have a discussion with either
 18 Ms. Johnson or your attorney either this morning or any
 19 time from October 18th to today?

20 MS. JOHNSON: Objection. Attorney-client
 21 privilege.

22 MR. BRAVE: I'm not at attorney-client
 23 privileged information yet. I can ask her if she met
 24 with him because my next question is going to be whether
 25 or not the both of you were in the room because you --

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1 A. We were just basically speaking about the
 2 deposition and that she -- that there was a subpoena for
 3 the deposition and that was really the -- the gist of
 4 the conversation. Nothing more, nothing less.

5 Q. Nothing of substance?

6 A. Nothing, unh-unh.

7 Q. And you did receive -- did you in fact
 8 receive a copy of the subpoena from Ms. Johnson?

9 A. No. I actually received it at my home from
 10 your attorneys.

11 Q. And that's the only copy that you received?

12 A. Yes.

13 Q. Do you recall when that was?

14 A. No, I don't. I believe it was -- it was one
 15 night last week. I was actually at home because I had
 16 worked two jobs and I -- I don't recall the day. I
 17 think it was either Tuesday or Wednesday maybe. I don't
 18 know. I'm sorry. I don't recall which day it was.

19 Q. And was there a check for your appearance
 20 here today attached to the subpoena?

21 A. Yes.

22 Q. Did you read through the subpoena?

23 A. Yes.

24 Q. We'll get into the substance of it here in a
 25 few minutes.

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<p style="text-align: right;">Page 18</p> <p>1 This morning what time did you meet with 2 Ms. Johnson?</p> <p>3 A. I arrived here 9:00, between 9:15 and 9:30 4 sometime.</p> <p>5 Q. Okay. My question was what time did you meet 6 with Ms. Johnson?</p> <p>7 A. When I arrived here.</p> <p>8 Q. And what has been discussed between yourself 9 and Ms. Johnson so far this morning prior to this point?</p> <p>10 A. Nothing. We were really just talking about 11 animals and just things of a personal nature. It was 12 nothing about the case. There was nothing about the 13 deposition. It was strictly about personal things, 14 dogs, cats, horses.</p> <p>15 Q. So while Ms. Johnson was either discussing 16 with you or present you discussed absolutely nothing 17 substantive or substantial about this case, is that 18 correct?</p> <p>19 A. That is correct.</p> <p>20 Q. I'm showing you what's been marked as Exhibit 21 1, which is -- I'm sure you'll recognize it as a copy of 22 your affidavit in this case. Do you recognize the 23 document?</p> <p>24 A. Yes, sir.</p> <p>25 Q. Is that in fact the copy of your affidavit</p>	<p style="text-align: right;">Page 20</p> <p>1 wrong or exaggerated in any way?</p> <p>2 A. No.</p> <p>3 Q. Paragraph 2, is there anything in that 4 paragraph that is incorrect, wrong or exaggerated in any 5 way?</p> <p>6 A. No.</p> <p>7 Q. You reported directly to Tom Smith?</p> <p>8 A. I worked with Tom Smith. I didn't report 9 necessarily to him. I worked with him on things.</p> <p>10 Q. Okay. Would you please --</p> <p>11 A. I did --</p> <p>12 Q. I'm sorry. I didn't mean to interrupt.</p> <p>13 A. I did actually work on assignments or tasks 14 when he, you know, he would give me tasks and 15 assignments, so I felt as though being in the position I 16 was in that I actually did report to him as well since 17 he was an officer of the company.</p> <p>18 Q. Okay. You just -- as I understand it, and I 19 might have to have it read back, you first said you did 20 not report to him, then at the end you said you did 21 report to him.</p> <p>22 A. I did -- I'm sorry.</p> <p>23 Q. Is there any document, either your -- 24 anything in your employment or anything in your job 25 offer, et cetera that said you report to Tom Smith?</p>
<p style="text-align: right;">Page 19</p> <p>1 that's been provided in this case?</p> <p>2 A. I'm sorry. Could you repeat the question? I 3 was coughing.</p> <p>4 Q. Is that in fact a copy of your affidavit that 5 you did provide in this case?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Is it a true and accurate copy?</p> <p>8 A. Yes.</p> <p>9 Q. And looking at the last page, which is page 5 10 of 5, is that your signature?</p> <p>11 A. Yes.</p> <p>12 Q. And did you sign that in front of a notary?</p> <p>13 A. Yes.</p> <p>14 Q. Under penalties of perjury?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. Go back to page 1.</p> <p>17 A. Okay.</p> <p>18 MR. REDHAIR: And just for the record she 19 doesn't have the original, right, she has a copy of 20 it --</p> <p>21 MR. BRAVE: Correct.</p> <p>22 MR. REDHAIR: -- in front of her.</p> <p>23 MR. BRAVE: Yes.</p> <p>24 Q. Just go paragraph by paragraph. Paragraph 1, 25 is there anything in that paragraph that is incorrect,</p>	<p style="text-align: right;">Page 21</p> <p>1 MR. REDHAIR: Object to form.</p> <p>2 THE WITNESS: Not -- not in my job -- not in 3 the letter that they had given to me, no. But it did 4 actually say in my -- my letter that, you know, I would 5 be responsible for other tasks assigned to me or that it 6 would be, you know, just a normal standard everyday type 7 employment letter that, you know, you would report to or 8 as assigned, you know, tasks that were assigned to you 9 that you would be responsible for them.</p> <p>10 BY MR. BRAVE:</p> <p>11 Q. Do you know of any Taser document that states 12 that you reported to Tom Smith?</p> <p>13 A. Not to my knowledge, no.</p> <p>14 Q. Paragraph 3. It's listed at the top as page 15 3 of 5. It's actually page two of the affidavit. In 16 paragraph 3 is there anything there that's incorrect, a 17 falsehood or an exaggeration?</p> <p>18 A. No.</p> <p>19 Q. Paragraph 4, is there anything in that 20 paragraph that is a falsehood, an exaggeration or a 21 misstatement?</p> <p>22 A. No.</p> <p>23 Q. Paragraph 5, the first sentence only, is 24 there anything there that is an exaggeration, a 25 falsehood or a misstatement?</p>

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<p style="text-align: right;">Page 22</p> <p>1 A. No.</p> <p>2 MS. JOHNSON: Object to the form.</p> <p>3 MR. BRAVE: To what aspect of the form?</p> <p>4 MS. JOHNSON: The word "exaggeration" is</p> <p>5 vague.</p> <p>6 BY MR. BRAVE:</p> <p>7 Q. What is your definition of the word</p> <p>8 "exaggeration"?</p> <p>9 MS. JOHNSON: Asked and answered.</p> <p>10 THE WITNESS: As I stated earlier, to me it's</p> <p>11 not the complete truth.</p> <p>12 BY MR. BRAVE:</p> <p>13 Q. Okay. Again let's go with this part. "While</p> <p>14 creating the spreadsheet I became aware that there were</p> <p>15 hundreds, if not thousands."</p> <p>16 What would be the upper end of the number</p> <p>17 that you would speculate on that number, hundreds if not</p> <p>18 thousands?</p> <p>19 MR. REDHAIR: Object to form.</p> <p>20 BY MR. BRAVE:</p> <p>21 Q. You can answer.</p> <p>22 A. I would -- I would say it would be -- there</p> <p>23 were several. You know, I couldn't give you a number.</p> <p>24 There were --</p> <p>25 Q. Sorry.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Could there have been less than 200?</p> <p>2 A. It could be.</p> <p>3 Q. Could there have been less than 100?</p> <p>4 A. Possibly.</p> <p>5 Q. Could there have been less than 50?</p> <p>6 A. I don't know. I mean, it could be. I don't</p> <p>7 know.</p> <p>8 Q. So when you make this statement "there were</p> <p>9 hundreds, if not thousands" you really don't know how</p> <p>10 many there were, do you?</p> <p>11 MR. REDHAIR: Object to form.</p> <p>12 MR. BRAVE: What aspect of it?</p> <p>13 MR. REDHAIR: The foundation. I don't think</p> <p>14 you've established her -- exactly what she's done and</p> <p>15 what she's seen and -- at least in this deposition as</p> <p>16 far as the accident reports and the information that</p> <p>17 she's looked at and reviewed in preparation for what she</p> <p>18 was asked to do.</p> <p>19 BY MR. BRAVE:</p> <p>20 Q. You can answer the question.</p> <p>21 A. I'm -- I know that with all the information</p> <p>22 that I saw that there was probably more than 50. There</p> <p>23 was probably more than 100. That there were -- it</p> <p>24 appeared to be hundreds.</p> <p>25 Q. But you don't know?</p>
<p style="text-align: right;">Page 23</p> <p>1 A. I honestly could not tell you. I know that</p> <p>2 there were -- there were probably close to, you know, a</p> <p>3 thousand. I mean, there had to have been. There were</p> <p>4 several. But I -- I'm not -- I'm not here to analyze.</p> <p>5 I wasn't here to -- I wasn't there to actually analyze.</p> <p>6 I just know what I saw.</p> <p>7 Q. Okay. So, just to be clear, I said the word</p> <p>8 "thousands." You said there were several. So you're</p> <p>9 saying there were several thousand?</p> <p>10 A. No. Several hundred, if not a thousand.</p> <p>11 Q. If not a thousand?</p> <p>12 A. Thousands, uh-huh.</p> <p>13 Q. Okay. A thousand or thousands?</p> <p>14 A. Thousands. It's -- to me, it was -- there</p> <p>15 were -- there were several hundred, if not a thousand.</p> <p>16 Q. What would be the lower end on that several</p> <p>17 hundred?</p> <p>18 A. I -- I don't know. I mean, I would say maybe</p> <p>19 500.</p> <p>20 Q. Could there have been less than 500?</p> <p>21 A. There could be.</p> <p>22 Q. Could there have been less than 400?</p> <p>23 A. It could be.</p> <p>24 Q. Could there have been less than 300?</p> <p>25 A. It could be.</p>	<p style="text-align: right;">Page 25</p> <p>1 A. I don't know, that is correct.</p> <p>2 Q. Could there have been less than 40?</p> <p>3 A. Again I don't know. There could have been.</p> <p>4 Q. Could there have been less than 30?</p> <p>5 A. Possibly, but I don't believe so.</p> <p>6 Q. Could there have been less than 20?</p> <p>7 A. Possibly.</p> <p>8 Q. Could there have been less than 10?</p> <p>9 A. Possibly.</p> <p>10 Q. Could there have been anywhere between zero</p> <p>11 and 10?</p> <p>12 A. Possibly, but highly unlikely.</p> <p>13 Q. Okay. But the point is you really don't</p> <p>14 know, do you?</p> <p>15 A. No, I really don't know.</p> <p>16 Q. Would you please explain to me as I read this</p> <p>17 first sentence, "While creating the spreadsheet I became</p> <p>18 aware that there were hundreds, if not thousands, of</p> <p>19 injuries noted on the volunteer exposure reports," since</p> <p>20 this is under oath --</p> <p>21 A. Uh-huh.</p> <p>22 Q. -- please explain how that's not an</p> <p>23 exaggeration if you really don't know how many there</p> <p>24 were including less than 10?</p> <p>25 MR. REDHAIR: Object to form.</p>

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1 THE WITNESS: Well, first of all, because
 2 when I was going through all the reports it seems as
 3 though, you know, as you're reading the reports and you
 4 would see, you know, a burn or, you know, a muscle pull
 5 or someone injured their back or, you know, a number of
 6 different types of things, to me, even the most minor
 7 even if it was a small, you know, a burn or something,
 8 to me that was an injury. That I considered that to be
 9 an injury. And most of which, you know, it was there.
 10 There -- some had -- some had names on them, some did
 11 not. Some had the agency's name, some did not.

12 And I kept asking the question, you know,
 13 does this need to be on there because I didn't see how
 14 to, you know, how do we know what to put on there, what
 15 not to put on there, things like that. So I saw it,
 16 physically saw it, but that doesn't necessarily mean
 17 that it was actually ever on the -- the spreadsheet.

18 Q. Okay. This sentence doesn't say anything
 19 about the spreadsheet.

20 A. I know.

21 Q. It says "volunteer exposure reports."

22 A. But that's what I'm saying. I do know that
 23 there were, you know, several stacks of these papers
 24 everywhere and as you go through them you would see --
 25 it would mark "yes, injury," but maybe the injury wasn't

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1 Q. And you also --
 2 MR. REDHAIR: Sorry to interrupt. You guys
 3 are kind of talking over each other. So --
 4 THE WITNESS: I'm sorry.
 5 MR. REDHAIR: No. It happens all the time.
 6 So just wait 'til he finishes his question.
 7 THE WITNESS: Okay.
 8 MR. REDHAIR: And then he'll wait --
 9 THE WITNESS: Okay.
 10 MR. REDHAIR: -- 'til you finish your answer.
 11 THE WITNESS: Okay.

12 BY MR. BRAVE:

13 Q. And you also just stated the stacks were
 14 everywhere. Is that an exaggeration in your opinion?

15 A. No.

16 Q. Were they in Rick Smith's cubicle?

17 A. They were in Rick Smith's cubicle and just,
 18 you know, not -- not in huge stacks but he did have
 19 some.

20 Q. Were they in Ray Rivera's cubicle?

21 A. He had -- he had some binders back by him but
 22 they weren't actually on his desk.

23 Q. Well, you said they were everywhere so I'm
 24 trying to figure out if "everywhere" means just what it
 25 says, the word "everywhere," and I personally just find

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1 there. Or it would say "yes," you know, "slight burn on
 2 finger" or "yes, muscle spasms in back" or, you know, so
 3 on and so forth. So there were several of those that
 4 would say -- it would be marked, you know, "yes," there
 5 was an injury. Sometimes it would say what the injury
 6 was, sometimes it would not say what the injury was.

7 Q. But as you sit --

8 A. But I didn't sit there and physically count
 9 them, no. I didn't physically, you know, put them in a
 10 pile and start saying, okay, here's one, two, three,
 11 four. I didn't do that, no.

12 Q. But as you sit here today you have no idea
 13 how many there were including less than 10, correct,
 14 because that's what you just testified to a moment ago?

15 MR. REDHAIR: Object to the form.

16 THE WITNESS: Well, that is -- that is
 17 correct but I know that there were more than 10. I
 18 mean, I -- but I --

19 BY MR. BRAVE:

20 Q. Eleven?

21 A. Well, it could be 11. It could be a 111. It
 22 could have been, you know, 1,500. You know, without
 23 seeing all the stacks in front of me again and
 24 physically going through and counting them I cannot give
 25 you a number.

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1 it hard to believe that there were stacks of these
 2 everywhere throughout the Taser company.

3 MR. REDHAIR: Object to form.

4 MS. JOHNSON: Object to the form.

5 BY MR. BRAVE:

6 Q. So, therefore, were they everywhere?

7 MR. REDHAIR: Same objection.

8 THE WITNESS: Let me clarify that then. They
 9 may not have been everywhere. They were in the
 10 warehouse in boxes, they were in file cabinets, shoved
 11 in file cabinets, back by the training area, they were
 12 by Jamie Hill. They were, you know, at Doug Klint's
 13 office.

14 So, to me, everywhere is a broad spectrum I
 15 guess and I'm sorry that I did not mean it to be
 16 everywhere, but they were throughout the company in
 17 different spots.

18 BY MR. BRAVE:

19 Q. So in your opinion was the use of your word
 20 "everywhere" an exaggeration?

21 A. The word "everywhere" was a misstatement.

22 Q. Which was larger than where they actually
 23 were, so, therefore, it's an exaggeration, wasn't it?

24 MS. JOHNSON: Objection.

25 MR. REDHAIR: Object to form.

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<p style="text-align: right;">Page 30</p> <p>1 BY MR. BRAVE:</p> <p>2 Q. You can answer.</p> <p>3 A. I misstated a word.</p> <p>4 Q. Next sentence. "When Doug Clint and Rick Smith learned of the volume of injuries they became visibly concerned and upset." Is that a correct and accurate statement that is not exaggerated?</p> <p>5 A. Yes, that is correct.</p> <p>6 Q. The next sentence states: "At that time, the SEC and the Department of Justice were investigating the company concerning the" Taser device -- "the safety of the device." So, therefore, the time when Doug Clint and Rick Smith became visibly upset was the time of the SEC investigation, correct?</p> <p>7 MS. JOHNSON: Object to the form.</p> <p>8 THE WITNESS: Yes.</p> <p>9 BY MR. BRAVE:</p> <p>10 Q. The next statement says -- the next sentence states, "Mr. Clint and Mr. Smith told me to remove the data from the spreadsheets for most of the injuries which I had entered."</p> <p>11 So, therefore, that was at the same time as the SEC investigation, correct?</p> <p>12 MR. REDHAIR: Object to form.</p> <p>13 THE WITNESS: That is correct.</p>	<p style="text-align: right;">Page 32</p> <p>1 MR. REDHAIR: Speculation. She gave you her best estimate.</p> <p>2 MR. BRAVE: Her entire statement is speculation so, therefore, I'm entitled to ask the question.</p> <p>3 MS. JOHNSON: Object to the form.</p> <p>4 Argumentative question.</p> <p>5 BY MR. BRAVE:</p> <p>6 Q. Well, could it have been less than 40 data entries that you removed from the spreadsheet?</p> <p>7 MR. REDHAIR: Object to form.</p> <p>8 BY MR. BRAVE:</p> <p>9 Q. You can answer.</p> <p>10 A. That I removed from the spreadsheet? Highly unlikely.</p> <p>11 Q. Could it have been less than 30?</p> <p>12 A. It is highly unlikely.</p> <p>13 Q. Could it have been less than 20?</p> <p>14 A. Highly unlikely.</p> <p>15 Q. But could it have been less than 20?</p> <p>16 MR. REDHAIR: Object to form.</p> <p>17 THE WITNESS: It could have been it was highly unlikely.</p> <p>18 BY MR. BRAVE:</p> <p>19 Q. Could it have been less than 10?</p>
<p style="text-align: right;">Page 31</p> <p>1 BY MR. BRAVE:</p> <p>2 Q. How did Rick Smith and Doug Clint become aware of the injuries if you do not know of the number of injuries within pretty much any range?</p> <p>3 MR. REDHAIR: Object to form.</p> <p>4 THE WITNESS: Because as I was working on the spreadsheet I would actually involve them in my work. I would ask them questions. I would ask them, you know, what they felt. I mean, if it didn't say something, it just said "an injury," how did they actually want me to put that on the spreadsheet.</p> <p>5 BY MR. BRAVE:</p> <p>6 Q. "Mr. Clint and Mr. Smith told me to remove the data from the spreadsheets for most of the injuries which I had entered." Did you remove those entries?</p> <p>7 A. Yes, I did.</p> <p>8 Q. How many did you remove?</p> <p>9 A. There were probably, I would say on a minimum, 50.</p> <p>10 Q. And a maximum?</p> <p>11 A. A maximum I would say maybe 75 to 100.</p> <p>12 Q. Could it have been 40?</p> <p>13 A. It --</p> <p>14 MR. REDHAIR: Object to form.</p> <p>15 MR. BRAVE: What's wrong with my question?</p>	<p style="text-align: right;">Page 33</p> <p>1 MR. REDHAIR: Object to form.</p> <p>2 THE WITNESS: Possibly but highly unlikely.</p> <p>3 BY MR. BRAVE:</p> <p>4 Q. Could it have been anywhere from 1 to 10?</p> <p>5 MR. REDHAIR: Continuing objection to this line of questioning. Go ahead and answer.</p> <p>6 MR. BRAVE: Accept the objection.</p> <p>7 THE WITNESS: It could have been but it was highly unlikely.</p> <p>8 BY MR. BRAVE:</p> <p>9 Q. But it could have been, so it could have been as few as 1, correct?</p> <p>10 A. It could have been but highly unlikely.</p> <p>11 Q. The next sentence states: "They then shredded most of the reports showing injuries."</p> <p>12 First who was "they" just to be clear?</p> <p>13 A. Rick Smith and Doug Clint.</p> <p>14 Q. And this was at the time or after the SEC investigation, correct?</p> <p>15 A. It was during that time, yes.</p> <p>16 Q. And tell me how you know they shredded most of the reports showing injuries?</p> <p>17 A. Because I physically -- I witnessed them carrying the documents to the gray dumpsters for shredding purposes.</p>

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1 Q. Would you please describe your definition of
2 a dumpster?

3 A. It was a canister about maybe three, three to
4 four feet tall, almost like the big recycling dumpsters
5 that you would have at your home with a slit in the top
6 and a lock. It had two wheels on the back so you could
7 wheel it outside to the -- the truck that would come to
8 pick them up.

9 Q. So was it more of a large trash container --

10 A. Yes.

11 Q. -- than a dumpster?

12 A. Yes. Definitely more of a type of a very
13 large trash receptacle.

14 Q. And when you said they carried them to that,
15 is "they" Rick Smith and Doug Klint?

16 A. Yes, sir.

17 Q. Can you narrow down any more the exact time
18 or date that they did this?

19 A. The date, I can't recall the date, but it was
20 in the evening, late afternoon, early evening. We were
21 working there on compiling documents to send to the SEC
22 and the DOJ.

23 Q. And how many of these documents do you allege
24 that they took to the shred bin?

25 MR. REDHAIR: Object to form.

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1 for the -- the -- the binders that we were putting
2 together.

3 Q. Those documents that were on the desk that
4 you said were approximately 6 inches, had those been
5 processed in any way by you? Had they been brought in,
6 had they been numbered, anything like that?

7 A. I don't recall that particular stack. I
8 don't recall if they had numbers on them or not. I
9 don't recall if they had actually physically been looked
10 at or what.

11 There were boxes that I had in that were
12 ready to go to Alphagraphics that I had already boxed up
13 that were ready to go. So that particular stack I
14 honestly cannot tell you. I don't recall.

15 Q. How did those particular documents that we're
16 discussing right now get removed from the quantities of
17 Volunteer Exposure Reports?

18 A. Because they were -- we were -- they were
19 going through things to try and figure out what would be
20 sent to the SEC and what would be sent to the DOJ and
21 they were physically going through all the documents to
22 see what they wanted to go and what they didn't want to
23 go.

24 Q. And other than that stack, did they send all
25 of the other -- copies of all of the other Volunteer

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1 MR. BRAVE: What aspect of it?

2 MR. REDHAIR: I don't think she's alleging
3 anything. You're asking her questions of what she
4 observed, so --

5 BY MR. BRAVE:

6 Q. How many documents did you see Rick Smith
7 and/or Doug Klint of the Volunteer Exposure Reports that
8 you're saying they shredded, how many of those Volunteer
9 Exposure Reports showing injuries did you see them take?

10 A. I don't know an exact number of how many.
11 There was a stack on my desk that I would say was
12 maybe -- maybe 6 inches thick. It was, you know, a
13 stack like this that was sitting on my desk.

14 Q. Had that stack been processed by you?

15 MS. JOHNSON: Object to the form.

16 THE WITNESS: I don't recall if that stack
17 had actually been processed yet at that time.

18 BY MR. BRAVE:

19 Q. Do you recall --

20 A. There were --

21 Q. I'm sorry.

22 A. Oh, I'm sorry. There were several stacks
23 that we were going through because of going to Kinko's
24 or Alphagraphics or somewhere to get the documents put
25 on CD and also mass produced so that way we had a copy

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1 Exposure Reports to the SEC and the DOJ?

2 A. To my knowledge, yes.

3 Q. Approximately how many documents would that
4 have been?

5 A. There were binders full. There were -- to
6 the best of my recollection I think there were eight
7 binders. They were the big like 4 to 5 inch binders,
8 but I don't recall how many. I do recall that there
9 were -- there were several binders that they had sent.

10 Q. So, just to be clear, to your knowledge that
11 6 inch stack that you've already mentioned were the only
12 documents as far as you know that you're stating were
13 not sent to the DOJ or the SEC, correct?

14 A. As far as the injury reports to my knowledge,
15 yes.

16 Q. Are there any other documents that you say
17 were not forwarded to the SEC or DOJ?

18 A. There were some studies that were not sent.

19 Again I don't know the names of the studies, but there
20 were some studies that were also pulled out of the --
21 the gathering, you know, the information that they were
22 we were gathering that they had pulled out as well.

23 Q. How many studies are you stating that they
24 pulled out?

25 A. There were two or three. Again I don't

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<p style="text-align: right;">Page 38</p> <p>1 recall the names of the studies. I just -- I do recall 2 that there were some studies that they didn't -- by 3 maybe their counsel or something, they just did not feel 4 that were worthy to send and I don't know why. I don't 5 know all the facts behind that.</p> <p>6 Q. Anything else that you're stating that was 7 not sent to the SEC or the DOJ other than what you just 8 discussed?</p> <p>9 A. There were -- I'm trying to think of 10 everything that we were compiling. There was the -- the 11 Volunteer Exposure Forms. There were --</p> <p>12 Q. Okay. I don't mean to interrupt you, but all 13 I'm asking for is anything else that you specifically 14 know other than what you've already discussed was not 15 sent to the SEC or the DOJ. I'm not asking what was 16 sent.</p> <p>17 A. Oh. No, I know. I'm trying in my mind to 18 remember everything that we were going through and of 19 all the things, all the documents that we were looking 20 at, and I know that the forms, the use forms were some 21 of the things that they didn't send all of those. And I 22 know that there were some studies and I don't recall 23 some of the other things, but I do recall that there 24 were some other documents that they were going through.</p> <p>25 Q. On the use forms, what do you mean by -- what</p>	<p style="text-align: right;">Page 40</p> <p>1 A. Possibly. I don't know. 2 Q. Could it have been less than 5? 3 A. It could have been possibly. I don't know. 4 Q. Could it have been between 1 and 5? 5 A. Possibly. I don't know. 6 Q. You stated that it was approximately a 6 inch 7 stack that Rick Smith and Doug Clint shredded at the 8 time of the SEC investigation. How many Volunteer 9 Exposure Reports were in that stack that they allegedly 10 shredded -- rephrase -- that they shredded? 11 A. I -- I don't know. However many pieces of 12 paper I, you know, a stack this tall. It could have 13 been a thousand, it could have been 1,500. I don't -- I 14 don't know. 15 Q. Could it have been less than 100? 16 A. It could have been. 17 Q. Could it have been less than 50? 18 MR. REDHAIR: Object to form. 19 THE WITNESS: It could have been. 20 BY MR. BRAVE: 21 Q. Could it have been less than 40? 22 MR. REDHAIR: Same objection. 23 THE WITNESS: It could have been. 24 BY MR. BRAVE: 25 Q. Could it have been less than 30?</p>
<p style="text-align: right;">Page 39</p> <p>1 is your definition of the use forms? 2 A. Well, there were different types. There was 3 the volunteer use form and then there was the form that 4 the officers filled out when using it on a suspect. 5 Q. And -- 6 A. So there were two different types. 7 Q. And which ones specifically or both are you 8 saying that there were certain ones that were not sent 9 to the SEC or the DOJ, just the Volunteer Exposure Forms 10 or the Field Use Reports or both? 11 A. It was both. There were both. 12 Q. And how many of the Field Use Reports are you 13 saying were not sent to the SEC or the DOJ? 14 A. There weren't as many of the Field Use 15 Reports as there were the Volunteer Exposure Reports 16 only because we didn't get many of the Field Use Reports 17 in. 18 I don't know if it was agency specific or 19 not. I don't recall that. But we didn't get as many of 20 those in. So that I just -- I can't really tell you one 21 way or the other which was -- how many of which -- of 22 which. I can't tell you that. I don't know. 23 Q. So on the Field Use Reports that you're 24 saying were not sent to the SEC or the DOJ, could it 25 have been less than 10?</p>	<p style="text-align: right;">Page 41</p> <p>1 MR. REDHAIR: Same objection. 2 THE WITNESS: Yes. 3 BY MR. BRAVE: 4 Q. Could it have been less than 20? 5 MR. REDHAIR: Same objection. 6 THE WITNESS: Yes. 7 BY MR. BRAVE: 8 Q. Could it have been less than 10? 9 MR. REDHAIR: Form. 10 THE WITNESS: Yes. 11 BY MR. BRAVE: 12 Q. Could it have been anywhere from 1 to 10? 13 MR. REDHAIR: Same objection. 14 THE WITNESS: Yes. 15 BY MR. BRAVE: 16 Q. Reading that entire sentence it states: 17 "They then shredded most of the reports showing 18 injuries, bringing in dumpsters to dispose of the 19 paper." 20 First we've already, I think, established 21 that dumpsters were the shred bins you discussed, 22 correct? 23 A. Yes. 24 Q. Okay. This leads one to believe that they 25 brought in those shred bins to dispose of this paper.</p>

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<p style="text-align: right;">Page 42</p> <p>1 Is that why they brought them in? 2 MR. REDHAIR: Object to the form. 3 MS. JOHNSON: Objection. 4 THE WITNESS: I don't believe that that was 5 the specific reason for the dumpsters being -- being 6 brought in, no. 7 BY MR. BRAVE: 8 Q. Why were the dumpsters brought in? 9 A. I think that Rick was nervous because of 10 things that were getting out to maybe the media or 11 things that were being -- you know, the people were able 12 to get to documents that they shouldn't be getting to 13 through maybe dumpster diving or through, you know, just 14 being in the trash, just, you know, in a trash can. 15 That was my -- my understanding of why the dumpsters 16 were actually brought in. 17 Q. So Rick Smith had a legitimate reason for 18 bringing in the shred bins because of his concerns of 19 dumpsters divers and people taking documents out of the 20 trash, correct? 21 MS. JOHNSON: Object to form. 22 MR. REDHAIR: Object to form. 23 THE WITNESS: I would believe so, yes. 24 BY MR. BRAVE: 25 Q. Okay. So this sentence says, "They then</p>	<p style="text-align: right;">Page 44</p> <p>1 BY MR. BRAVE: 2 Q. You can answer. 3 A. It does say that, yes. And -- 4 Q. I'm sorry. 5 A. -- and the dumpsters were brought in at that 6 same time and at that same time that the same dumpsters 7 were there we were going through the information and 8 conveniently enough the documents were getting put in 9 the dumpsters. 10 Q. And the only documents that you are alleging 11 were put in the dumpsters was this stack from your desk 12 of Volunteer Exposure Reports, is that correct? 13 MR. REDHAIR: Object to form. Go ahead. 14 THE WITNESS: And it was that and also there 15 were some other studies or some forms of studies that 16 were also in there. 17 BY MR. BRAVE: 18 Q. And you've already stated that was two or 19 three studies and you do not know what they were or why 20 it was done, correct? 21 A. That is correct. 22 Q. The next sentence: "Many of the destroyed 23 documents contained reports of injuries to the back." 24 A. Uh-huh. 25 Q. Question one: What is your definition of the</p>
<p style="text-align: right;">Page 43</p> <p>1 shredded most of the reports showing injuries, bringing 2 in dumpsters to dispose of the paper." Please explain 3 why that's not misleading? 4 MR. REDHAIR: Object to the form. Go ahead. 5 THE WITNESS: Because at the time when we 6 were doing the SEC investigation and the DOJ, it was at 7 that same exact time that these dumpsters were being 8 brought in, so it was kind of hand in hand. They were 9 both -- the dumpsters were there at the same time that 10 we were actually compiling the -- all the information 11 for the investigations. 12 Or -- and I want to clarify something. The 13 SEC investigation and the DOJ, I'm not sure if that was 14 an investigation or an informal investigation. I don't 15 remember what the DOJ was actually looking for. 16 BY MR. BRAVE: 17 Q. In reading this sentence it says, "They then 18 shredded most of the reports showing injuries, bringing 19 in dumpsters to dispose of the paper." 20 Does that not state that they brought the 21 dumpsters to dispose of the paper that they shredded 22 regarding these Volunteer Exposure Reports? Isn't that 23 what this says? 24 MS. JOHNSON: Object. 25 MR. REDHAIR: Object to form.</p>	<p style="text-align: right;">Page 45</p> <p>1 word "many"?</p> <p>2 A. Many could be 100 to 500. It could be 500 to 3 1,000. To me, many is more than even 2. 4 Q. Could it be less than -- could "many of the 5 destroyed documents contained reports of injuries to the 6 back," could there have been less than 100 Volunteer 7 Exposure Reports that reported injuries to the back? 8 MR. REDHAIR: Object to form. 9 THE WITNESS: Yes. 10 BY MR. BRAVE: 11 Q. Could there have been less than 50? 12 MR. REDHAIR: Continuing just so I don't have 13 to interrupt. 14 MR. BRAVE: I agree. Accepted. 15 MR. REDHAIR: Continuing objection. Okay. 16 BY MR. BRAVE: 17 Q. Could there have been less than 50 Volunteer 18 Exposure Reports -- 19 A. Yes. 20 Q. -- that contained injuries to the back? 21 A. Yes. 22 Q. Could there have been less than 40? 23 A. Yes. 24 Q. Could there have been less than 20? 25 A. Yes.</p>

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<p style="text-align: right;">Page 46</p> <p>1 Q. Could there have been less than 10? 2 A. Yes. 3 Q. Could there be between 1 and 10? 4 A. I would say possibly, but to me "many" means 5 multiple, so it would be more than at least 2. 6 Q. More than 2. 7 Could it have been 2? 8 A. It could have been 2. 9 Q. Okay. So, "many," as I understand it now, is 10 anywhere from 2 to thousands, correct? 11 A. Correct. 12 Q. Okay. Please identify at least the 2 that 13 you're aware of that you took into consideration in 14 having this sentence written? 15 A. Do you mean who they were or -- 16 Q. Anything you can identify about those 2 17 Volunteer Exposure Reports -- 18 MS. JOHNSON: Object to form. 19 BY MR. BRAVE: 20 Q. -- that contained an injury to the back? 21 MS. JOHNSON: Object to the form. 22 MR. REDHAIR: Join. 23 THE WITNESS: Well, I don't recall the 24 physical documents, but I know that there, you know, the 25 way they were marked and most of the injuries were to</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. But there's absolutely nothing you have to 2 more closely identify any of those reported back 3 injuries, correct? 4 MR. REDHAIR: Object to the form. 5 THE WITNESS: That is correct. 6 BY MR. BRAVE: 7 Q. Paragraph 6, is there anything in that 8 paragraph that is inaccurate, untruthful, a falsehood, 9 an exaggeration? 10 A. That is -- that is correct. That's true. 11 Q. There's nothing there that is inaccurate, is 12 that what you're telling me? 13 A. That is very true, yes. There is nothing 14 inaccurate about that statement. 15 Q. In the sentence that begins with, "In 16 December of 2004, I was taken off Taser International's 17 premises to another location and confronted by two 18 Chandler, Arizona police officers who accused me of 19 leaking the investigation to the press." Do you see 20 that paragraph? 21 A. Yes. 22 Q. Or I'm sorry, that sentence? 23 A. That sentence, yes. 24 Q. What were the dates in December of 2004? 25 A. I don't recall the dates. It was late in the</p>
<p style="text-align: right;">Page 47</p> <p>1 the back. They weren't actually -- there were more 2 injuries to backs than there were the burns, and when 3 it's an injury to a back what I'm also referring to are 4 muscle spasms, back spasms, things of that nature. 5 BY MR. BRAVE: 6 Q. So you -- of the 2 to thousands there's 7 nothing specific that you can identify for me regarding 8 those Volunteer Exposure Reports that contained reports 9 of injuries to the back, correct? 10 A. Correct. 11 Q. Do you know of any Volunteer Exposure Report 12 that you ever handled that stated anything regarding a 13 fracture to the back, a compression fracture to the back 14 or anything any kind of break to the back, et cetera? 15 MS. JOHNSON: Object to form. 16 THE WITNESS: I do recall seeing them. 17 However, I don't recall the agencies or, you know, what 18 part of the country they were from or anything like that 19 but I do recall seeing some, yes. 20 BY MR. BRAVE: 21 Q. Okay. And I think we've agreed now that that 22 "some" could be as few as 2 or as many as 1,000? 23 A. Yes. 24 Q. Or I'll rephrase. Thousands, correct? 25 A. Yes.</p>	<p style="text-align: right;">Page 49</p> <p>1 year. It could have been actually early January, 2 because I do know that I met with them also in January 3 prior to my leaving. 4 Q. So the -- 5 A. I don't recall the dates. I'm sorry. 6 Q. So the date of December of 2004 could be 7 inaccurate? 8 A. It could be. 9 Q. Anything else in this paragraph that is 10 inaccurate, misleading or an exaggeration? 11 A. No. 12 MR. REDHAIR: Object to form. 13 THE WITNESS: Without actually looking at 14 my -- my, you know, my letters that were given to me 15 from Taser, I -- no. 16 BY MR. BRAVE: 17 Q. Could the dates that you met with the 18 Chandler -- rephrase -- the Taser investigators who did 19 happen to be Chandler, Arizona police officers, could 20 they have been January 14, 2005, January 24, 2005 and 21 January 27, 2005? 22 A. Yes, sir, they could have been. 23 Q. Do you have any reason to believe those are 24 not the correct dates? 25 A. No.</p>

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<p style="text-align: right;">Page 50</p> <p>1 Q. Paragraph 7. Is there anything in paragraph 2 7 that is an exaggeration, an embellishment or a 3 misstatement or a falsehood?</p> <p>4 MS. JOHNSON: Object to the form.</p> <p>5 MR. REDHAIR: Join.</p> <p>6 THE WITNESS: No.</p> <p>7 BY MR. BRAVE:</p> <p>8 Q. Do you recall what date you left -- first 9 sentence, "Since leaving Taser International." What is 10 the date that you're referring to about leaving Taser 11 International?</p> <p>12 A. My last hire -- you mean the date I was hired 13 would have been at the end of January. I believe it was 14 the 27th or the 28th --</p> <p>15 Q. So --</p> <p>16 A. -- of January.</p> <p>17 Q. I'm sorry.</p> <p>18 MR. REDHAIR: Just to clarify, you said 19 "hired."</p> <p>20 THE WITNESS: Oh. I meant fired.</p> <p>21 BY MR. BRAVE:</p> <p>22 Q. So in the first sentence, "Since leaving 23 Taser International," the beginning date for that 24 statement would be January 27, 2005, correct?</p> <p>25 A. January, 2005. Yes, that is correct.</p>	<p style="text-align: right;">Page 52</p> <p>1 A. Probably not.</p> <p>2 Q. Okay. So it could have been as many as 20 3 but not as many as 25.</p> <p>4 Could it have been 23?</p> <p>5 A. It could have been.</p> <p>6 Q. Could it have been 24?</p> <p>7 MR. REDHAIR: Can I have a continuing 8 objection --</p> <p>9 MR. BRAVE: Yes.</p> <p>10 MR. REDHAIR: -- to the questioning?</p> <p>11 BY MR. BRAVE:</p> <p>12 Q. Could it have been 24?</p> <p>13 A. It could have been, yes.</p> <p>14 Q. Where did those verbal harassments, verbal 15 threatenings take place? I'm sorry. I'll withdraw the 16 question.</p> <p>17 Within what time period -- we have the one 18 date, January 27, 2005. When was the last time you were 19 verbally threatened by people hired by Taser to harass 20 and intimidate you?</p> <p>21 A. There was -- the one time that I can 22 actually --</p> <p>23 Q. I don't mean to interrupt you. My question 24 was when was the last time?</p> <p>25 A. I don't know the date. I don't recall. It</p>
<p style="text-align: right;">Page 51</p> <p>1 Q. And if I assert to you at that it was 2 January 27, 2005 would you have any basis to disagree 3 with that?</p> <p>4 A. No, I would not. It was some time at the end 5 of January.</p> <p>6 Q. The next sentence: "I have been verbally 7 threatened by people hired by Taser to harass and 8 intimidate me." How many times were you verbally 9 threatened by people hired by Taser?</p> <p>10 A. There were multiple occasions.</p> <p>11 Q. How many is "multiple"?</p> <p>12 A. Well, on occasions there were several.</p> <p>13 Q. How many are several?</p> <p>14 A. I would say probably 10 at least.</p> <p>15 Q. Could it have been 5?</p> <p>16 A. No, no, it could not have been 5.</p> <p>17 Q. Could it have been 9?</p> <p>18 A. No.</p> <p>19 Q. So it was at least 10?</p> <p>20 A. At least 10.</p> <p>21 Q. Could it have been 15?</p> <p>22 A. It could have been.</p> <p>23 Q. Could it have been 20?</p> <p>24 A. It could have been.</p> <p>25 Q. Could it have been 25?</p>	<p style="text-align: right;">Page 53</p> <p>1 was after being deposed from the Sam Powers case.</p> <p>2 Q. Was it in 2000 -- was it in calendar year 3 2007 that you were last verbally threatened by people 4 from Taser?</p> <p>5 A. In 2007?</p> <p>6 Q. Yes.</p> <p>7 A. This year?</p> <p>8 Q. Yes.</p> <p>9 A. No, but --</p> <p>10 Q. Was it in 2006 the last time that you were 11 verbally harassed -- rephrase -- verbally threatened by 12 people hired by Taser to harass and intimidate you?</p> <p>13 A. There were some occasions in 2006, yes.</p> <p>14 Q. When the last time in 2006 that you were 15 verbally threatened by people hired by Taser to 16 intimidate you?</p> <p>17 A. There was a point where I was actually at 18 work in some -- it was in South Phoenix and I had -- 19 there was a vehicle sitting outside in the parking lot 20 and they actually followed me down the I-10. Every time 21 I changed lane, they would change lane. And they were 22 two goons. I couldn't tell you who they were. And they 23 followed me. They would pull up alongside of me. They 24 would make comments. They would try and run me off the 25 road. They would do everything and anything. Why, I</p>

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<p style="text-align: right;">Page 54</p> <p>1 don't know.</p> <p>2 I was sure I had put Taser behind me. I 3 don't and I didn't want to be bothered. I didn't want 4 to have anything to do with them. I was done with them 5 and that's why I wanted to leave them, but they thought 6 obviously that there was something that I knew or 7 something that I was going to do and I wasn't going to 8 do anything. And there were things that were going on 9 that I was involved with and, you know, I -- you know, I 10 was being investigated by everybody, and so I don't 11 know.</p> <p>12 MR. REDHAIR: I think he's trying to get a 13 date.</p> <p>14 THE WITNESS: But I don't actually have a 15 date and that's what I'm trying to say. I don't have 16 the physical dates, you know, in my mind. I'm trying to 17 put it behind me. I'm trying to forget it.</p> <p>18 BY MR. BRAVE:</p> <p>19 Q. Can you narrow it down any closer than 2006?</p> <p>20 A. No. There was, you know --</p> <p>21 Q. For the last time that you --</p> <p>22 A. It would probably be late spring, you know, 23 early summer area.</p> <p>24 Q. You said you were being investigated by 25 everybody. Please name everybody?</p>	<p style="text-align: right;">Page 56</p> <p>1 evidence do you have to state that the two goons, as you 2 stated, who followed you from your place of employment 3 were people hired by Taser?</p> <p>4 MR. REDHAIR: Object to form.</p> <p>5 THE WITNESS: It was --</p> <p>6 MR. BRAVE: What aspect?</p> <p>7 MR. REDHAIR: You're asking what evidence she 8 has. I mean, she's not here to allege or make proving. 9 She's here to answer questions. So I think it's 10 argumentative and not -- appropriately it would be, you 11 know, "Why do you think these two goons were hired by 12 Taser?"</p> <p>13 MR. BRAVE: That wasn't my question. The 14 statement in paragraph 7 is "I have been verbally 15 threatened by people hired by Taser." That means that 16 she has to have some kind of proof that those people 17 were hired by Taser. I have a right to ask that 18 question.</p> <p>19 MR. REDHAIR: You have a right to ask it, but 20 I think it's argumentative. You could say why do you 21 think she blah, blah, blah and I have no objection to 22 that.</p> <p>23 BY MR. BRAVE:</p> <p>24 Q. What proof do you have that the two goons 25 that you say harassed you in the spring to summer 2006</p>
<p style="text-align: right;">Page 55</p> <p>1 A. Well, the Chandler police, Chandler 2 detectives, whoever they were.</p> <p>3 I was also investigated by the FBI. I had, 4 you know, contact from, you know, the FBI. And ever 5 since those two organizations it just seems as though I, 6 you know, all these things have been coming out of the 7 woodwork.</p> <p>8 Q. Okay. When you say Chandler police are you 9 referring to the two investigators retained by Taser 10 back in January of '07 --</p> <p>11 A. Yes.</p> <p>12 Q. -- or are you referring to the Chandler 13 Police Department and other officers under their 14 official capacities?</p> <p>15 A. The two detectives.</p> <p>16 Q. So you're stating that -- when was the last 17 time you saw either one of them?</p> <p>18 A. They actually -- I saw them the last day 19 of -- that I was actually fired from Taser and that was 20 the end of January that I physically saw them.</p> <p>21 Q. So you haven't seen either one of them since 22 January 27th of 2005?</p> <p>23 A. I've physically seen them then, yes. That 24 was the last time I've physically seen them.</p> <p>25 Q. What evidence -- upon what basis or what</p>	<p style="text-align: right;">Page 57</p> <p>1 were people hired by Taser?</p> <p>2 MR. REDHAIR: Object to form.</p> <p>3 THE WITNESS: Statements that were made to me 4 that, you know, verbal statements that were made to me 5 and in most cases every time it was, you know, "You 6 really don't want to, you know, go up against Taser. 7 You don't want to testify against Taser. You know, do 8 you really want to do this? Do you really want to go 9 and do a deposition for Taser?" And that's what I heard 10 from all of the people that approached me.</p> <p>11 I'd be coming out of a grocery store. There 12 would be, you know, I had two guys standing by my truck. 13 I'd come out of a grocery store and this was right 14 before the Powers case. You know, "You better be 15 careful. Do you really want to go do this? You know, 16 do you know you're going up against Taser and you really 17 better be careful. Watch your back." That's what I 18 would get from the people that were harassing me.</p> <p>19 And in most cases it was always different 20 people. It was not the same people. The two guys that 21 were in the truck that were outside of my work, they 22 were goons. They literally were these big guys that if 23 they would have ran me off the road they probably would 24 have been -- they probably would have injured me badly, 25 not just from causing an accident but they could have</p>

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<p style="text-align: right;">Page 58</p> <p>1 caused me bodily harm. And they were screaming things 2 out the window at me about Taser.</p> <p>3 BY MR. BRAVE:</p> <p>4 Q. So just --</p> <p>5 A. So --</p> <p>6 Q. Sorry.</p> <p>7 A. So, in my mind they obviously knew who I was. 8 They knew that I had something to do with Taser. Well, 9 there's only -- to me, there's only one way that they 10 would know that. So that's how I -- I gathered my 11 information.</p> <p>12 Q. But as you sit here today you have absolutely 13 no proof, none, physical evidence or any other type that 14 the people who threatened or harassed you were actually 15 hired by Taser, correct?</p> <p>16 MS. JOHNSON: Objection.</p> <p>17 MR. REDHAIR: Hold on. Object to form.</p> <p>18 BY MR. BRAVE:</p> <p>19 Q. You can answer.</p> <p>20 A. I don't have the paperwork or the documents 21 showing that they gave them a check or stock options but 22 they, you know, I -- I am going by what was said to me 23 and the way I was harassed and intimidated.</p> <p>24 Q. Okay. But the people were different -- the 25 people who threatened you were different every time --</p>	<p style="text-align: right;">Page 60</p> <p>1 A. His name is Lee Andrew.</p> <p>2 Q. Does he still work at that location to your 3 knowledge?</p> <p>4 A. He does, yes.</p> <p>5 Q. Why didn't you follow it up with filing a 6 statement or report with the police?</p> <p>7 A. Because I was in fear of my life because 8 everybody that so far had come to me, they were 9 intimidating me and harassing me and I was afraid for my 10 life as well as my family. I didn't want anything to 11 happen. I didn't know who they were and I didn't know 12 who -- you know, Taser has a lot of influential, you 13 know, they have the cops behind them. They have the law 14 enforcement. They have all kinds of authorities that 15 respect them and I didn't know who these people were. I 16 didn't know who -- who was coming after me. I didn't 17 know who they were and I didn't know what was going to 18 happen.</p> <p>19 Q. In what geographical area did this incident 20 occur where the two goons were threatening you?</p> <p>21 A. It was 67th Avenue and Southern.</p> <p>22 Q. Do you know what city or village that's in?</p> <p>23 A. Laveen, Arizona.</p> <p>24 Q. So you did not contact the Laveen police?</p> <p>25 A. Okay.</p>
<p style="text-align: right;">Page 59</p> <p>1 A. Uh-huh.</p> <p>2 Q. -- correct?</p> <p>3 A. Uh-huh.</p> <p>4 Q. And other than their statements you have no 5 basis upon which to say they were hired by Taser, 6 correct?</p> <p>7 MR. REDHAIR: Object to form.</p> <p>8 THE WITNESS: Correct.</p> <p>9 BY MR. BRAVE:</p> <p>10 Q. Now, in the 2006 incident where were you 11 working at that time? Where is it they started 12 following you from?</p> <p>13 A. It was from -- it was in Laveen, Arizona 14 which is south of here.</p> <p>15 Q. And what's the name of the organization or 16 entity you were working for?</p> <p>17 A. It was -- it was Arnold Machinery.</p> <p>18 Q. Did you report that harassment to the police?</p> <p>19 A. I actually attempted to call the police from 20 my cellphone and when I was trying to call from my 21 cellphone I don't know if I had bad reception or what 22 but it was not going through. I actually had a 23 radio-type phone from my work and I actually contacted 24 one of the technicians that worked with me.</p> <p>25 Q. And who was that?</p>	<p style="text-align: right;">Page 61</p> <p>1 MR. REDHAIR: Objection to form. Go ahead.</p> <p>2 THE WITNESS: I just wanted to make sure you 3 were done. I'm sorry.</p> <p>4 I tried to call but my cellphone was not 5 working. I could not get out on my actual cellphone.</p> <p>6 BY MR. BRAVE:</p> <p>7 Q. But you did not file follow-up or file a 8 report with the Laveen police, is that correct?</p> <p>9 A. No, I did not.</p> <p>10 Q. What county is that in?</p> <p>11 A. I believe it's Maricopa. I'm not sure. I 12 think it's Maricopa.</p> <p>13 Q. Do you file any kind of a complaint or 14 statement or anything else with the Maricopa County 15 Sheriff's Department or any of its subsidiaries?</p> <p>16 A. No, I did not.</p> <p>17 Q. In the state of Arizona did you file anything 18 with the state police?</p> <p>19 A. No, I did not.</p> <p>20 Q. Since you were in contact with or had been in 21 contact with the FBI, did you file anything with the 22 Federal Bureau of Investigation?</p> <p>23 A. Not about -- not at that time, no.</p> <p>24 Q. Have you at any time?</p> <p>25 A. Not -- not saying that they needed to, you</p>

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<p style="text-align: right;">Page 62</p> <p>1 know, press charges or anything like that but what I -- 2 what I spoke to the FBI about was between the FBI and I. 3 Q. When did you speak to the FBI last? 4 A. I actually -- the last contact I had with 5 them was in 2006 but I don't recall the date. 6 Q. Who made that contact, you to them or them to 7 you? 8 A. Them to me. 9 Q. What did they want? 10 A. Again I think that that's between us. They 11 contacted me for some discussions. 12 Q. What did they want? There's no privilege 13 there. What did they want? 14 A. Well, I -- I was told that I didn't have to 15 discuss that. They told me I didn't have to discuss 16 what we talked about. 17 Q. Unless your attorney is going to instruct you 18 not to answer, I want to know what the conversation was 19 about. Why did they call you? 20 MR. REDHAIR: Well, if the FBI told her not 21 to discuss it -- 22 THE WITNESS: Yeah. 23 MR. REDHAIR: -- I don't think that she 24 should be discussing it because that privilege goes far 25 beyond me.</p>	<p style="text-align: right;">Page 64</p> <p>1 Q. Out of New York. 2 Do you know which of the New York offices he 3 was out of? 4 A. No, I could not tell you. 5 Q. Do you have any -- sorry. 6 A. I could not tell you. I don't -- he's out of 7 New York. I don't know -- I don't know how many offices 8 they have. I don't know. 9 Q. Can you narrow down when in 2006 you had this 10 conversation with the FBI agent out of New York? 11 A. It was probably -- again it was probably 12 springtime, maybe early summer. 13 Q. How long did the conversation last? 14 A. Maybe fifteen minutes. 15 Q. I'll come back to it, but how many other 16 conversations have you had with FBI agent or agents? 17 A. Maybe five. 18 Q. During what time period? 19 A. From March, 2005 'til 2006. 20 Q. Were they all from the same office? 21 A. I believe they were. 22 Q. Do you remember any of their names? 23 A. No. It was either Richard or Robert. And 24 then there was a gentleman by the name of Bob. 25 Q. Do you have any documents from any of these</p>
<p style="text-align: right;">Page 63</p> <p>1 BY MR. BRAVE: 2 Q. You understand that any time the FBI 3 interviews someone you are aware that a specific form is 4 filled out regarding that discussion? 5 A. Uh-huh. 6 Q. So you understand that, therefore, the FBI 7 will have a copy of this report? 8 A. Uh-huh. 9 Q. You also, I assume understand that under 10 TFOIA, the Freedom of Information Act, I'm entitled to a 11 copy of that report? 12 MR. REDHAIR: Object to form. 13 MS. JOHNSON: Form. 14 THE WITNESS: I was actually -- I was 15 actually told that that form will come to me because 16 there's information on the form that is needed in order 17 to obtain the information. 18 BY MR. BRAVE: 19 Q. Who were the agents you spoke, agent or 20 agents, FBI agents or agents you spoke with? 21 A. His first name was David. 22 Q. What was his last name? 23 A. I can't remember. 24 Q. What FBI -- 25 A. He's out of New York.</p>	<p style="text-align: right;">Page 65</p> <p>1 FBI agents, a business card, a letter, any document 2 whatsoever, an e-mail, regarding anything to do with the 3 FBI in these five contacts? 4 A. I have some information that was given to me, 5 but again I was told I didn't have to discuss it. I 6 was -- that's what they specifically told me in the 7 meeting that I had with them. 8 Q. What form was this information that you have 9 in? 10 A. I had a -- I had a business card for David 11 and I also had a subpoena for grand jury at one point. 12 Q. Do you still have those documents? 13 A. I don't know if I do or not. To be honest 14 with you I don't. 15 Q. But if you do have the documents where would 16 they be? 17 A. If I had them they'd be at home. 18 Q. Do you believe you do still have them? 19 A. Possibly. But I would not -- I don't want to 20 say yes or no because I don't want to say I have them 21 and then I don't have them. I don't know. 22 Q. Do you agree that if you do still have these 23 documents not to destroy them or in any way damage them 24 until we decide how we're going to handle acquiring 25 copies of these documents?</p>

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<p style="text-align: right;">Page 66</p> <p>1 A. Yeah. I'll keep them if I have them. 2 Q. Any other conversations or communications 3 between yourself and the FBI that you're aware of? 4 A. No. 5 Q. So, just to be clear, you're flat out 6 refusing to tell me anything regarding the substance of 7 these communications with the FBI agents? 8 MR. REDHAIR: Object to form. 9 MR. BRAVE: What part of the form? 10 MR. REDHAIR: "Flat out refusing." She was 11 advised by them not to talk about it. 12 MR. BRAVE: No. Sir, just so you know, I 13 used to be Chief of Intelligence of Investigative 14 Operations for Justice. I'm real familiar with the FBI 15 and their protocols. I'm also real familiar with what 16 they can and cannot do. I'm also familiar with the U.S. 17 Attorneys Guidebook, so I know what had been done. 18 Personally I doubt that she was told that because these 19 FBI agents would not do that. 20 MR. REDHAIR: Okay. Well -- 21 BY MR. BRAVE: 22 Q. So, are you going to -- I'll soften the 23 question. Are you refusing at this point to tell me 24 anything more about your communication with the FBI? 25 A. It's not that I'm refusing. I am doing what</p>	<p style="text-align: right;">Page 68</p> <p>1 the grocery store. There was a Bashas' at Tatum and 2 Bell. That's normally where I would do my shopping. 3 And I would go in and when I'd come out there would be 4 one, sometimes two and it would be along the same type 5 deal. 6 And any time I saw somebody, you know, 7 following me, there would be people sitting in front of 8 my house, you know, in the middle of the night, in the 9 evening, one at night. 10 I actually had to go pick up my son from his 11 then girlfriend's house who lived maybe a mile away. 12 When I left there was a Chevy truck, a four-door 13 four-wheel drive lifted type truck sitting across from 14 my house. I live on a cul-de-sac. And when I backed 15 out, as soon as I backed out he followed me. He got 16 behind me and started following me and followed me up 17 until the time that I actually stopped in front of my 18 son's girlfriend's -- then his girlfriend at that time, 19 in front of her house and he sped off. 20 Q. Again going back in time chronologically from 21 the two goons who followed you from work, what was the 22 time immediately before that when someone verbally 23 threatened -- or when you were verbally threatened by 24 people hired by Taser to harass and intimidate you? 25 A. That was at the grocery store.</p>
<p style="text-align: right;">Page 67</p> <p>1 they advised me not to do. I mean, that is what they 2 told me. That is what they advised me. 3 Q. Specifically who advised you not to -- 4 specifically who advised you that it is prohibiting you 5 from telling me right here and now under oath what those 6 communications consisted of? 7 MR. REDHAIR: Object to form. 8 THE WITNESS: The agent David from New York. 9 I don't know what his last name is. 10 BY MR. BRAVE: 11 Q. And you don't know which office? 12 A. I don't. I didn't -- I didn't realize that 13 they had multiple offices. I know he's from New York 14 but I didn't know that they had different offices. I 15 just know he's from New York. 16 Q. Okay. We've discussed one incident of 17 verbally being -- verbally threatened by people hired by 18 Taser to harass and intimidate you. 19 Going back in time from that event, please 20 tell me the one that occurred before that? 21 A. Well, there were many. 22 Q. Let's take them in sequence. 23 A. Okay. I'm sorry. Let me retract that. 24 Q. In reverse chronological order, please. 25 A. Okay. There were on multiple occasions at</p>	<p style="text-align: right;">Page 69</p> <p>1 Q. And what did they say? 2 A. They -- 3 Q. How many were there? 4 A. There were -- there were two at that time but 5 they were different gentlemen. They were -- they were 6 gentlemen that were somewhat clean-cut. They weren't -- 7 they didn't come across as, you know, goon-type people, 8 meaning they were very clean-cut, you know, soft -- with 9 a Polo-type shirt. I think they had jeans on. They 10 were probably in their 30s, you know. 11 And I saw them as I was walking out. My 12 truck was facing Tatum and so I had to go to the 13 passenger side and they were kind of standing on the 14 other side, on the driver's side of the truck, and as I 15 came around there was a car over there so I didn't think 16 really anything of it until I got around there and when 17 I got around to the other side of my truck they asked me 18 who I, you know, if I was Pam and I said, "Well, I don't 19 know. Might. Who are you?" 20 And they said, you know, "Just watch your 21 back." 22 And I said, "Well, what does that mean?" 23 And they said, "Well, you know, we know that 24 you used to work at Taser and we also know that you are, 25 you know, going to trial and you need to be careful."</p>

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<p style="text-align: right;">Page 70</p> <p>1 And I said, "Well, what does that mean that I 2 need to be careful?" 3 And they said, "Just watch your back. You 4 need to watch your back." 5 Q. When did this incident occur? 6 A. That was around the Sam Powers case. 7 Q. What part of the Sam Powers case? 8 A. That was after I did my deposition and then I 9 received a subpoena to actually go to the trial and then 10 I was actually called and said that I didn't have to 11 appear for the trial. 12 Q. So, going back in time, the first 13 chronologically going in reverse order were the two 14 goons at work? 15 A. That was in 2006. 16 Q. And the time just before that was right 17 around the Sam Powers trial, which was November to 18 December, 2005? 19 A. Yeah, I would say --. 20 Q. Correct? 21 A. I don't remember when the trial was. I don't 22 remember when the subpoena was. I know that it was some 23 time in 2005 but I don't recall when. 24 Q. If I tell you that the trial was November or 25 December, 2005 would you have any basis to dispute that?</p>	<p style="text-align: right;">Page 72</p> <p>1 A. No. 2 Q. Chronologically going back in time from that 3 one, when was the previous time to that? 4 A. Again it was at a grocery store. It was not 5 Bashas' though. It was actually in a strip mall type 6 facility and at that time when I was -- I had just got 7 there and I saw a car pull up and it was a little red 8 type car, although it was a small like Dodge or some 9 kind of a smaller vehicle, and I saw that car pull in 10 behind me and when I pulled into the parking spot they 11 pulled up right behind me and they just started yelling 12 and screaming things at me and just -- nothing 13 consistent, just very negative remarks to me and they -- 14 they came across to me as very threatening. 15 Q. When was that? 16 A. That would have been probably in June or 17 July. 18 Q. Of? 19 A. 2005. 20 Q. Where was the grocery store in the strip mall 21 where that took place? 22 A. That was actually over by the PV Mall area, 23 Tatum and Cactus area. 24 Q. Going back to the other one first, did you at 25 any time file any kind of a police report or notify the</p>
<p style="text-align: right;">Page 71</p> <p>1 A. No, I wouldn't. 2 Q. And I believe you said you haven't seen those 3 two people since? 4 A. Those two people at the grocery store, no. 5 Q. Have you ever seen them at any other time 6 other than at the grocery store at that point in time? 7 A. No, because I honestly, you know, again I was 8 trying to put all this behind me and, you know, every 9 time I see somebody on the street if I see people 10 walking in front of my house I wonder, you know, are 11 they somebody that is going to threaten me again. I 12 don't go outside my house any more. I sit in my house 13 other than work. 14 Q. Just to be clear, the answer to my question 15 was "no," correct? 16 A. Correct. 17 Q. What evidence or proof do you have that those 18 two people were hired by Taser to harass and intimidate 19 you? 20 MR. REDHAIR: Object to form. Go ahead. 21 THE WITNESS: Just by their statements that 22 they were making to me. 23 BY MR. BRAVE: 24 Q. Did they say they were hired by Taser to 25 harass or intimidate you?</p>	<p style="text-align: right;">Page 73</p> <p>1 police or make any kind of a statement to the police 2 regarding that incident? 3 A. No. 4 Q. This one you just mentioned, at any time did 5 you again file any kind of a statement or police report 6 or notify the police in that event? 7 A. No. 8 Q. If this was right about the time you were 9 being communicated with by the FBI, did you tell the FBI 10 about any of these? 11 A. At that time? 12 Q. At any time. 13 A. I don't recall. I really -- I don't recall. 14 I'm sorry. 15 Q. Could that be a "no," that you did not notify 16 the FBI at any time of this harassment? 17 MR. REDHAIR: Object to the form. Go ahead. 18 THE WITNESS: It could be, but I don't 19 recall. 20 BY MR. BRAVE: 21 Q. And this last incident you just talked about, 22 the one in I think you said June, 2005, that time 23 period, do you have any reason other than their 24 statements to say they were people hired by Taser to 25 harass and intimidate you?</p>

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<p style="text-align: right;">Page 74</p> <p>1 A. No.</p> <p>2 Q. Did they say they were people hired by Taser 3 to harass and intimidate you?</p> <p>4 A. No.</p> <p>5 Q. Did they -- other than that one event, have 6 you ever seen those people again?</p> <p>7 A. No.</p> <p>8 Q. Okay. Again chronologically going back in 9 time from that one, when was the time prior to that?</p> <p>10 A. There was a time in March and when I actually 11 was at home and when I was actually sitting at my -- on 12 my couch watching TV and I had a car sitting out in 13 front of my house revving the engine. I had walked 14 outside to see who it was because I honestly thought it 15 was maybe one of my kids and I didn't want them to be, 16 you know, making noise because I didn't want the 17 neighbors to be disturbed, and when I walked outside 18 there was a car. It was actually a red Dodge truck. I 19 remember it was a small -- the smaller version of the 20 Dodge truck, and it had a red cover on the back. And 21 somebody screamed something out the window at me. About 22 that time they took and spun gravel all over me and all 23 over my house and sped off and that vehicle I did see a 24 few times after that.</p> <p>25 Q. How many people were in the truck?</p>	<p style="text-align: right;">Page 76</p> <p>1 Q. Did they state at any time that they were 2 people hired by Taser to harass or intimidate you?</p> <p>3 A. No.</p> <p>4 Q. Okay. Chronologically going back in time to 5 the next event, when would that be?</p> <p>6 A. I -- I don't know. There's so many. I 7 actually have dates in my, you know, in my mind of like 8 time-frame-wise and the order any more, it's just it was 9 one event after another. It seemed as though every time 10 I turned around there was somebody else behind me that 11 was always there behind me. And I -- I don't -- I can't 12 tell you.</p> <p>13 I can tell you that there was a point in time 14 where a bullet came through my garage window and that it 15 scared me because, you know, all of a sudden you hear 16 glass shattering and there's a bullet in your -- came 17 through your window of your garage. And again, you 18 know, you hear a car, you see a car go whizzing by and, 19 you know, there goes a bullet through your window. 20 Thank God that it was only into the garage because it 21 could have went through -- you know, it could have went 22 through the window where we all sit for dinner or 23 whatever.</p> <p>24 Q. So, from starting off in those prior three 25 events going back in time chronologically, what was the</p>
<p style="text-align: right;">Page 75</p> <p>1 A. I couldn't see. The windows were dark.</p> <p>2 Q. What was it that they yelled at you?</p> <p>3 A. Some obscenities and they basically told me 4 that they know where I am.</p> <p>5 Q. Did you file any kind of a police report in 6 that event?</p> <p>7 A. No, because at that time when that happened 8 one of my neighbors actually saw it happen and she just 9 said, "Just, you know, probably some kids. You know, 10 don't worry about it. They just, you know" -- and I 11 just said, "No, you don't understand" and I just walked 12 back in my house.</p> <p>13 Q. What neighbor was that?</p> <p>14 A. It was a neighbor to the west of me.</p> <p>15 Q. What's her name?</p> <p>16 A. I -- I don't know. She doesn't live there 17 any more. She's moved out. She's only lived there a 18 few months. I don't even know where she moved to.</p> <p>19 Q. Did she contact the police or file any kind 20 of a police report or give you anything in writing?</p> <p>21 A. No.</p> <p>22 Q. Do you have any evidence to prove that those 23 people, person or people were hired by Taser to harass 24 and/or intimidate you?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 77</p> <p>1 event just prior to that one?</p> <p>2 A. The --</p> <p>3 MS. JOHNSON: Objection. Which one?</p> <p>4 BY MR. BRAVE:</p> <p>5 Q. You've given me three events, correct, 6 chronologically in time going backwards?</p> <p>7 A. There was --</p> <p>8 Q. Correct?</p> <p>9 What would have been --</p> <p>10 MS. JOHNSON: Misstates her testimony.</p> <p>11 BY MR. BRAVE:</p> <p>12 Q. What would have been the one prior to that 13 event?</p> <p>14 MR. REDHAIR: Object to form.</p> <p>15 BY MR. BRAVE:</p> <p>16 Q. Well, prior to the grocery store strip mall 17 event, prior to that one, what was the one in time 18 before that?</p> <p>19 A. There were --</p> <p>20 MR. REDHAIR: Object to form. Go ahead.</p> <p>21 THE WITNESS: There were actually two 22 incidents, one at a grocery store, one at a strip mall.</p> <p>23 BY MR. BRAVE:</p> <p>24 Q. Yes.</p> <p>25 A. And those are two separate issues. Those are</p>

20 (Pages 74 to 77)

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<p style="text-align: right;">Page 78</p> <p>1 two separate incidences.</p> <p>2 Q. So, if my memory is correct, you told me</p> <p>3 about three incidents: The goons from work, the grocery</p> <p>4 store by Basha, the grocery store strip mall.</p> <p>5 A. Okay.</p> <p>6 Q. That was 2006, approximate trial of Powers,</p> <p>7 November, December, 2005, and it was also then the March</p> <p>8 of 2005. From March, from that event going back in</p> <p>9 time, what was the next previous event?</p> <p>10 MR. REDHAIR: Object to form. Go ahead.</p> <p>11 THE WITNESS: Between -- between March and</p> <p>12 November you also skipped the one where somebody spun</p> <p>13 rocks all over me and my house, somebody has followed me</p> <p>14 on a couple of occasions with my -- following me from my</p> <p>15 house to my friends, girlfriend's at that time's house,</p> <p>16 and then there was also the bullet that came through my</p> <p>17 garage window. Right there is seven cases, seven</p> <p>18 different incidences that I can tell you.</p> <p>19 BY MR. BRAVE:</p> <p>20 Q. When was the time that the person spun the</p> <p>21 rocks outside your house?</p> <p>22 A. That was right around the deposition time of</p> <p>23 the Sam Powers case.</p> <p>24 Q. When was the time that someone followed you</p> <p>25 to where you were taking your son?</p>	<p style="text-align: right;">Page 80</p> <p>1 A. The individuals I've never seen again.</p> <p>2 Q. Nor had you seen them before?</p> <p>3 A. Never before, no.</p> <p>4 Q. What evidence did you collect of these</p> <p>5 various harassments? Did you take photos of the</p> <p>6 vehicles or the people, did you record anything, did you</p> <p>7 get the license plate numbers, did you file any police</p> <p>8 reports or anything with the police? Is there any</p> <p>9 official record with any police agency, law enforcement</p> <p>10 agency anywhere on any of these events?</p> <p>11 MR. REDHAIR: Object to form.</p> <p>12 THE WITNESS: No.</p> <p>13 BY MR. BRAVE:</p> <p>14 Q. And you have no evidence or proof that these</p> <p>15 people who verbally threatened you were hired by Taser,</p> <p>16 correct?</p> <p>17 A. Correct.</p> <p>18 Q. The last sentence of paragraph 7 states, "In</p> <p>19 the summer of 2005, shortly before giving my deposition</p> <p>20 in the Powers versus Taser case, a window was shot out</p> <p>21 of my residence," correct?</p> <p>22 A. Uh-huh. That's what I said. It was some</p> <p>23 time around the deposition of the Powers case and the</p> <p>24 actual trial. I couldn't give you the actual date. It</p> <p>25 was some time around the deposition is what I said.</p>
<p style="text-align: right;">Page 79</p> <p>1 A. That would have been around April or May of</p> <p>2 2005 at the same time-frame as the whole deposition, the</p> <p>3 Powers deal.</p> <p>4 Q. And when was the time of the bullet through</p> <p>5 the garage window?</p> <p>6 A. That would have been right around that same</p> <p>7 time-frame, around the Powers, between the deposition</p> <p>8 and the actual trial.</p> <p>9 Q. Okay. If I remember correctly, the</p> <p>10 deposition was May 25th of '05, the trial was November</p> <p>11 of '05.</p> <p>12 A. Right. So it was some time in that</p> <p>13 time-frame.</p> <p>14 Q. Can you narrow it down any closer?</p> <p>15 A. It was probably mid to late summer.</p> <p>16 Q. Okay. Any other times?</p> <p>17 A. There were -- like I said, there were</p> <p>18 occasions where people were following me and just</p> <p>19 verbally saying things out the window to me, people</p> <p>20 sitting in front of my house. You know, to me, I</p> <p>21 considered that to be harassment. They didn't even have</p> <p>22 to say anything. I took it as harassment.</p> <p>23 Q. And you've never seen any of these people</p> <p>24 other than at the one time event when the harassment was</p> <p>25 occurring, correct?</p>	<p style="text-align: right;">Page 81</p> <p>1 Q. But it was before the deposition?</p> <p>2 A. It was some time around there, correct. I</p> <p>3 can't remember the date. I don't -- I cannot even</p> <p>4 remember when the deposition was actually taken or</p> <p>5 given.</p> <p>6 Q. Okay. The deposition, if I recall it, was</p> <p>7 May 25th of '05, but this states "in the summer of 2005</p> <p>8 shortly before giving my deposition."</p> <p>9 A. Right.</p> <p>10 Q. So, was that a truthful statement or not?</p> <p>11 A. Because I was going by the fact that it was</p> <p>12 in the summer and I remember giving my deposition. It</p> <p>13 was -- to me, it was summer.</p> <p>14 So it was around the deposition of the Powers</p> <p>15 case. That is what I said.</p> <p>16 Q. No. You can look at the document. It says,</p> <p>17 "shortly before giving my deposition."</p> <p>18 A. Correct.</p> <p>19 Q. True?</p> <p>20 A. And that was correct.</p> <p>21 Q. So, therefore, it was before your deposition?</p> <p>22 A. It was around that time, yes.</p> <p>23 Q. Okay. It was either -- it either was before</p> <p>24 the deposition, which is what the affidavit says, or it</p> <p>25 wasn't. It was either before, during or after. Was it</p>

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<p style="text-align: right;">Page 82</p> <p>1 before?</p> <p>2 MR. REDHAIR: Object to the form.</p> <p>3 THE WITNESS: I would say yes, that it was</p> <p>4 before giving my deposition.</p> <p>5 BY MR. BRAVE:</p> <p>6 Q. Did you report the window being shot out to</p> <p>7 any authorities of any kind?</p> <p>8 A. No, I did not.</p> <p>9 Q. What evidence or proof do you have that in</p> <p>10 any way ties Taser to the shooting out of the window?</p> <p>11 A. Just coincidental.</p> <p>12 Q. So that means you have no evidence or proof?</p> <p>13 MR. REDHAIR: Object to form.</p> <p>14 THE WITNESS: That is correct.</p> <p>15 BY MR. BRAVE:</p> <p>16 Q. Paragraph 8. Is there anything in that</p> <p>17 paragraph that is incorrect, a falsehood or an</p> <p>18 exaggeration?</p> <p>19 A. No. Those are true to my knowledge.</p> <p>20 Q. Do you have any additional explanations that</p> <p>21 I've missed? Withdraw that.</p> <p>22 The first sentence, "Rick Smith, Tom Smith</p> <p>23 and Doug Clint are responsible for hiding and covering</p> <p>24 up information on the extent of injuries to officers</p> <p>25 during Taser trainings." Other than what we've</p>	<p style="text-align: right;">Page 84</p> <p>1 A. Maybe 10, maybe 20.</p> <p>2 Q. So, basically it could have been as few as 5?</p> <p>3 A. True.</p> <p>4 MR. REDHAIR: Object to form.</p> <p>5 THE WITNESS: It could have been.</p> <p>6 BY MR. BRAVE:</p> <p>7 Q. Could it have been 1?</p> <p>8 MR. REDHAIR: Object to form.</p> <p>9 THE WITNESS: Maybe.</p> <p>10 BY MR. BRAVE:</p> <p>11 Q. The second sentence: "I know this because I</p> <p>12 was instructed to alter the spreadsheets and saw them</p> <p>13 destroy documents." Anything other than what we</p> <p>14 discussed here today supports that sentence?</p> <p>15 A. No.</p> <p>16 Q. The third sentence: "Doug Clint told me that</p> <p>17 the lawsuits against Taser would go away because there</p> <p>18 would be no documents to prove that Taser knew that</p> <p>19 injuries were happening." Other than what we have</p> <p>20 discussed here today, do you have any evidence</p> <p>21 whatsoever to support that statement?</p> <p>22 A. No.</p> <p>23 Q. Paragraph 9. "Since leaving Taser</p> <p>24 International I have lived in fear of what Taser</p> <p>25 International will do to me." But you have absolutely</p>
<p style="text-align: right;">Page 83</p> <p>1 discussed here today, do you have any other evidence</p> <p>2 supporting that statement?</p> <p>3 A. No.</p> <p>4 Q. And what evidence -- you mentioned Rick Smith</p> <p>5 and Doug Clint earlier. What evidence do you have that</p> <p>6 Tom Smith was responsible for hiding and covering up</p> <p>7 information on the extent of injuries to the officers</p> <p>8 during Taser trainings?</p> <p>9 A. Just from general conversations and the way</p> <p>10 the forms were handled within the office. As far -- oh,</p> <p>11 I'm sorry.</p> <p>12 Q. Go ahead.</p> <p>13 A. As far as when the forms would come in and</p> <p>14 it -- at one point he would -- he would review them and</p> <p>15 hand them off to like Jamie or whoever was in the</p> <p>16 training area. He was responsible for those as far as</p> <p>17 looking at them and making sure what was on them.</p> <p>18 Q. Tom Smith was responsible for reviewing the</p> <p>19 Volunteer Exposure Reports?</p> <p>20 A. He would, yes. He would actually review</p> <p>21 them.</p> <p>22 Q. So you're saying --</p> <p>23 A. I don't know if he reviewed all of them, but</p> <p>24 I do know that he reviewed some.</p> <p>25 Q. How many is some?</p>	<p style="text-align: right;">Page 85</p> <p>1 no proof other than your statements supporting that</p> <p>2 sentence, correct?</p> <p>3 MR. REDHAIR: Object to the form.</p> <p>4 THE WITNESS: It's -- that's my feeling.</p> <p>5 That is how I feel and that to me is a true statement.</p> <p>6 BY MR. BRAVE:</p> <p>7 Q. Do you have any evidence other than what</p> <p>8 you've stated here supporting that sentence?</p> <p>9 A. I do not have evidence, no.</p> <p>10 Q. You don't have any police reports?</p> <p>11 A. No.</p> <p>12 Q. You don't have any additional photographs, or</p> <p>13 any kind of photographs?</p> <p>14 A. No.</p> <p>15 Q. You don't have any license plate numbers?</p> <p>16 A. No.</p> <p>17 Q. You haven't identified any of these people</p> <p>18 who have harassed you?</p> <p>19 A. No.</p> <p>20 Q. You only saw them at the moment in time that</p> <p>21 they harassed you?</p> <p>22 A. Correct.</p> <p>23 Q. You have no evidence or proof tying them to</p> <p>24 being hired by Taser International, correct?</p> <p>25 MR. REDHAIR: Object to form.</p>

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<p style="text-align: right;">Page 86</p> <p>1 BY MR. BRAVE:</p> <p>2 Q. You can answer.</p> <p>3 A. Correct.</p> <p>4 Q. Paragraph 9, second sentence: "The company 5 has enormous resources and connections throughout law 6 enforcement." Are you trying to imply with that that 7 Taser has the power because of their enormous resources 8 and connections throughout law enforcement to intimidate 9 and harass you the way you've testified to here so far 10 today?</p> <p>11 MR. REDHAIR: Object to form.</p> <p>12 THE WITNESS: That is correct. That is how I 13 feel.</p> <p>14 BY MR. BRAVE:</p> <p>15 Q. But do you have any proof of that?</p> <p>16 MR. REDHAIR: Object to the form.</p> <p>17 THE WITNESS: No. Just I know -- I know that 18 they are -- how large they are and I do know their 19 connection with the law enforcement.</p> <p>20 BY MR. BRAVE:</p> <p>21 Q. Well, here's the distinction I'm making. 22 There's no doubt the company has enormous resources and 23 connections throughout law enforcement.</p> <p>24 My question is the implication that it's 25 through those resources and connections that they would</p>	<p style="text-align: right;">Page 88</p> <p>1 You know, the one thing I want to make sure 2 that is very clear that in a stack of documents that was 3 6 inches high it had to have been clearly more than 10, 4 20, 30, 40. It had to have been in the hundreds only 5 because of how thick the stack was.</p> <p>6 And at the time I didn't realize that I would 7 have to know how many were actually in that stack. I 8 didn't know how many because I didn't realize I'd be 9 sitting here in front of you today being deposed, so I 10 did not actually, you know, "Okay, I'm going to now 11 count each one of these."</p> <p>12 So I just want to clarify and make sure that 13 everyone understands that there was a stack on my desk 14 that was a minimum of 6 inches high, so there had to 15 have been clearly more than a hundred pieces of paper in 16 that stack.</p> <p>17 Q. During the break -- any other clarifications 18 or changes?</p> <p>19 A. That would be my --</p> <p>20 Q. During the break that we just had did you 21 speak to or in the presence of Ms. Johnson regarding 22 anything?</p> <p>23 A. We -- we did discuss the stack of papers.</p> <p>24 Q. What did you discuss exactly?</p> <p>25 A. How the numbers, you know, how many there</p>
<p style="text-align: right;">Page 87</p> <p>1 have -- that Taser would have been the sponsor through 2 these law enforcement agencies of the harassment that 3 you have testified to here today.</p> <p>4 MS. JOHNSON: Object to the form of that.</p> <p>5 MR. REDHAIR: Join.</p> <p>6 BY MR. BRAVE:</p> <p>7 Q. Is that what you're saying?</p> <p>8 A. Yes.</p> <p>9 MR. BRAVE: It's been an hour and a half.</p> <p>10 Take a break?</p> <p>11 MR. KYLER: We're going off the record. The 12 time is 11:34.</p> <p>13 (Short recess.)</p> <p>14 MR. KYLER: We are going back on the record.</p> <p>15 The time is 11:50. This begins tape 2 in the deposition 16 of Pamela Schreiner.</p> <p>17 MR. BRAVE: Are we back on?</p> <p>18 Q. Ms. Schreiner, are there any corrections you 19 want to make to your testimony you have already provided 20 today?</p> <p>21 A. The only thing that I would like to clarify 22 is the number -- the numbers that we kept throwing out 23 with the stack of papers when we were going through all 24 the paperwork and things like that, and I kept getting 25 asked, you know, 10, 40, 20, whatever.</p>	<p style="text-align: right;">Page 89</p> <p>1 were as far as, you know, the 10, 20, 30, 40 and I, you 2 know, basically said, "Well, you know, the stack was 6 3 inches high and I couldn't tell you if it was 10, 20, 4 30, 40. I just know that it was 6 inches high." So it 5 had to have been at least 100 sheets of paper and that 6 was really all we discussed.</p> <p>7 Q. So, just to be clear, if I remember correctly 8 your prior testimony was that that number could have 9 been as few as 2 and now it is a minimum of 100 after 10 speaking with Ms. Johnson, is that correct?</p> <p>11 MR. REDHAIR: Object to form.</p> <p>12 MR. BRAVE: What part of the form?</p> <p>13 MR. REDHAIR: Well, I think its implication 14 is objectionable and I think it misstates her testimony.</p> <p>15 Why don't we get some -- a stack of photocopy 16 paper and we can set it here and she can tell us how 17 many stacks that was and we can figure out how many 18 pages it was if you like.</p> <p>19 MR. BRAVE: So, to be clear, your only 20 objection is the implication?</p> <p>21 MR. REDHAIR: Well, and it was vague and 22 confusing. If you want to repeat it, I forgot the -- 23 what I thought the problem was.</p> <p>24 BY MR. BRAVE:</p> <p>25 Q. Regarding your previous statement that I</p>

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<p style="text-align: right;">Page 90</p> <p>1 believe it was 6 inches of paper on the corner of your 2 desk that Rick Smith and Doug Klint of the Volunteer 3 Exposure Reports took to the shred bin, your previous 4 testimony was it could have been as few as 2 Volunteer 5 Exposure Reports. Now, as I understand it, after 6 speaking to Ms. Johnson during the break you're saying 7 it was a minimum of 100. Did I mischaracterize 8 anything?</p> <p>9 MR. REDHAIR: Object to the form. Go ahead.</p> <p>10 THE WITNESS: At the time you had asked me 11 what "many" meant because it had said something about 12 many pieces of paper or something along that line in 13 here. You asked me what the term "many" meant and I 14 said it was a multiple, meaning it was more than 2 15 because in my opinion "many" means multiple and it's 16 more than 2.</p> <p>17 And I was stating to you that it was at least 18 100 because it was 6 inches thick and then you kept 19 breaking it down by, you know, 40, 50, whatever it was 20 you were breaking it down to and I kept saying it could 21 have been, it could have been, it could have been. 22 But it had to have been at least a minimum of 23 that. If you have a stack of papers this tall, then it 24 had to have been at least over 100 because, you know, to 25 me 100, you know, might be this thick. If you have a</p>	<p style="text-align: right;">Page 92</p> <p>1 Q. It could not have been 80? 2 A. No. 3 Q. It had to be 100 or more? 4 A. It had to have been 100 or more, yes. 5 MR. REDHAIR: Object to the form.</p> <p>6 BY MR. BRAVE:</p> <p>7 Q. And prior to speaking with Ms. Johnson you 8 testified it was 2 and after speaking with Ms. Johnson 9 it was 100 or more, correct?</p> <p>10 MR. REDHAIR: Object to form.</p> <p>11 THE WITNESS: That -- that is partly correct, 12 but it was also because that's what I was wanting or 13 trying to say when you were questioning me. I was 14 actually trying to say that it was more than 100 and I 15 felt as though you were asking me the question and I was 16 trying to answer the question.</p> <p>17 BY MR. BRAVE:</p> <p>18 Q. Anything else you want to correct or change 19 from your prior testimony?</p> <p>20 A. Not at this time.</p> <p>21 Q. Referring to Exhibit 1, the affidavit, who 22 prepared that?</p> <p>23 A. Cindy Johnson, Cynthia Johnson.</p> <p>24 Q. So it was prepared -- to your knowledge it 25 was prepared in Georgia?</p>
<p style="text-align: right;">Page 91</p> <p>1 stack that's 6 inches tall then it had to have been over 2 100 pieces of paper and that's what I was trying to get 3 through when you were asking me a question of how many 4 and you kept breaking it down. I was trying to say that 5 it was more than this many, but you -- I was being 6 honest and I was saying, yeah, it could have been, but 7 it had to have been at least 100 because you have a 8 stack that's this tall. There's no way it could have 9 been only 2. It couldn't have been only 10 and it 10 couldn't have been 40 or 50 or -- it was more than that. 11 So that's what I was trying to clarify.</p> <p>12 MR. BRAVE: Would you read back my question, 13 please?</p> <p>14 (Whereupon, the record was then read 15 back by the reporter as requested.)</p> <p>16 THE WITNESS: Okay.</p> <p>17 MR. REDHAIR: Same objection.</p> <p>18 BY MR. BRAVE:</p> <p>19 Q. You can answer.</p> <p>20 A. Okay. And again there were a stack of papers 21 that was at least 6 inches thick, which means to me that 22 it had to have been more than 100 sheets of paper 23 because of the stack and how big the stack was.</p> <p>24 Q. So it could not have been 90?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 93</p> <p>1 A. To the best of my knowledge, yes. 2 Q. Were there any drafts of this document? 3 A. I don't recall. There could have been. 4 Q. Do you have any of the drafts of this 5 document? 6 A. If I had it I would still have it, but I 7 don't recall if I have one. I -- I would have to look 8 and see. 9 Q. And what form would it be in, electronic, 10 paper, FAX? 11 A. It would have been mailed to me. 12 Q. If you do have one, where would it be located 13 now? 14 A. If I did have it, it would be at my home. 15 Q. And if you do have it, how many different 16 drafts would there be? 17 A. If there was any, it would probably be one. 18 There would only have been one. 19 Q. Do you agree with me at this point that if 20 you do have any drafts of this document at your home to 21 not destroy or shred or change anything? 22 A. No, I would not do that. 23 MR. REDHAIR: You do agree? 24 THE WITNESS: I do agree. I'm sorry. 25 MR. REDHAIR: "No, I would not do that"?</p>

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1 THE WITNESS: No, I'm sorry. I'm sorry. I
 2 will not shred it. I'm sorry.

3 BY MR. BRAVE:

4 Q. Referring to the -- I believe you said you
 5 got a subpoena from the FBI?

6 A. For a grand jury.

7 Q. The grand jury. And you no longer have that?

8 A. I don't know if I still have it or not.

9 Q. When did you receive it?

10 A. It was in 2005, April, March or April, 2005.

11 Q. To what court was that?

12 A. It was in New York.

13 Q. Did you ever meet with any of the FBI agents?

14 A. Yes.

15 Q. How many times?

16 A. There were -- there were three occasions.

17 Q. Where?

18 A. Once in their Phoenix office, once at my home
 19 and once at my place of employment.

20 Q. Within what time-frame?

21 A. Within probably maybe two months.

22 Q. And --

23 A. Maybe three.

24 Q. And in what year?

25 A. 2005.

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1 prepared after the conclusion of these meetings with the
 2 FBI agents?

3 MR. REDHAIR: 302s? Object to form.

4 THE WITNESS: I'm sorry. I don't know what a
 5 302 is.

6 BY MR. BRAVE:

7 Q. A 302 is a basic document that FBI agents
 8 create after each interview which lists and outlines
 9 their statements as to what occurred during that
 10 interview. If there were three formal interviews such
 11 as this, there will be three 302s and I'm curious as to
 12 whether you have copies of any of those three 302s?

13 MR. REDHAIR: Object to form.

14 THE WITNESS: Obviously I don't because I
 15 didn't know what they were.

16 BY MR. BRAVE:

17 Q. When did you receive the FBI business card?

18 A. At the first meeting.

19 Q. And where did that one take place again?

20 A. In Phoenix.

21 MR. REDHAIR: Is this Exhibit 2?

22 MR. BRAVE: Yes.

23 Q. Ms. Schreiner, I'm showing you what has been

24 marked Deposition Exhibit 2.

25 A. Uh-huh.

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1 Q. And what months?

2 A. Between April and July.

3 Q. The agents that you met with, which office
 4 were they out of?

5 A. The one -- they were out of New York. The
 6 one was out of New York. I'm not sure where the other
 7 two were from.

8 Q. During your three meetings with them how
 9 much -- on the very first meeting with them how much
 10 time were you together, how long?

11 A. Four to five hours.

12 Q. And the second time how long were you
 13 together?

14 A. I would say maybe -- maybe twenty minutes.

15 Q. And the third time?

16 A. Another fifteen to twenty minutes.

17 Q. And as we sit here now are you going to tell
 18 me what was discussed during those meetings with the FBI
 19 agents?

20 MR. REDHAIR: No, she's not.

21 MR. BRAVE: And you're directing her not to
 22 answer?

23 MR. REDHAIR: Yes.

24 BY MR. BRAVE:

25 Q. Do you have copies of the 302s that were

1 Q. Will you identify that document?

2 A. It's says "Amended Subpoena in a Civil Case."

3 Q. Is this the document that was served upon you
 4 last week, a copy of the document?

5 A. Actually, this is different than the one I --
 6 the front page is different than the one I have.

7 Q. The two pages I'm concerned about is Exhibit
 8 A, which is page 3.

9 A. Oh, I'm sorry.

10 Q. No, that's okay. That's my fault.

11 Does Exhibit A look like what you were served
 12 with?

13 A. I believe so, yes.

14 Q. Okay. Let's go down the list. And you knew
 15 that you were to bring these documents with you under
 16 the subpoena, correct?

17 MR. REDHAIR: Object to the form. I
 18 instructed her not to bring certain documents.

19 BY MR. BRAVE:

20 Q. Without going into any communications you had
 21 with your attorney, which are -- please identify on
 22 Exhibit A which ones your attorney directed not to
 23 bring?

24 MR. REDHAIR: I don't feel comfortable having
 25 her answer those questions. I'll tell you which ones.

25 (Pages 94 to 97)

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<p style="text-align: right;">Page 98</p> <p>1 MR. BRAVE: That's fine. As long as I get 2 the information, I don't care where I get it from. 3 MR. REDHAIR: Specifically number 6. 4 MR. BRAVE: The entire paragraph? 5 MR. REDHAIR: Yes. 6 MR. BRAVE: Okay. Go on. 7 MR. REDHAIR: Seven. 8 MR. BRAVE: Okay. The entire paragraph? 9 MR. REDHAIR: Yes. 10 MR. BRAVE: Okay. Continue. 11 MR. REDHAIR: Nine. 12 MR. BRAVE: I assume the entire statement? 13 MR. REDHAIR: Yes. And we can -- the entire 14 statement unless I say otherwise to make it easier. 10, 15 11, 14, 15 and 16. And let me just review because I may 16 have said some others. 17 Also number 5. I mean, medical bills, I 18 can't see how they are relevant for a fact witness. The 19 same thing with the cellular phones and all of the 20 diaries about doctors and health care providers. 21 MR. BRAVE: All my question is, sir, is which 22 ones. Are there any others that you instructed her not 23 to bring? 24 MR. REDHAIR: I don't recall off the top of 25 my head. Those were the ones that jumped out at me when</p>	<p style="text-align: right;">Page 100</p> <p>1 Q. You understood that you were under subpoena 2 to bring those, that information to this deposition, 3 correct? 4 A. Correct. 5 Q. And do you have anything or know of anything 6 outside of Taser International that would be relevant to 7 number 2 or comply with number 2? 8 A. No. I think we've already covered that 9 before because I don't -- I didn't have any reports or 10 anything. I didn't -- we have already discussed that. 11 Q. You testified in your October 18, 2007 12 deposition that first you had notes of the harassment. 13 A. Uh-huh. 14 Q. That would comply with number 2, would it 15 not? 16 A. Yes. And when I actually -- when I actually 17 was at home I was trying to pull together my documents 18 and I did not have anything that would be more than what 19 I'm saying to you today. 20 Q. So you do not have any written notes of any 21 kind regarding the statements of harassment, correct? 22 A. That is correct. 23 Q. Also on October 18, 2007 at that deposition 24 you stated that you had the receipts for the window that 25 your husband replaced from your garage that was shot</p>
<p style="text-align: right;">Page 99</p> <p>1 I reread the list. 2 BY MR. BRAVE: 3 Q. Ms. Schreiner, referring to Exhibit Number 2, 4 page 3 of that exhibit, which is Exhibit A to the 5 subpoena. 6 A. Uh-huh. 7 Q. Number 1, did you bring anything referenced 8 to number 1 with you today to this deposition? 9 A. No, I did not. 10 Q. And you knew that you were under subpoena to 11 bring those, correct? 12 A. That is correct. 13 Q. Do you have anything that comports with 14 Exhibit Number -- excuse me -- with number 1 on Exhibit 15 2, page 3? 16 A. No, I do not have anything in my possession. 17 Q. Have you transferred anything to -- anything 18 that would fall under number 1 to anyone else's 19 possession or know of it to exist anywhere else other 20 than Taser International? 21 A. No. 22 Q. The same set of questions for number 2; did 23 you bring anything in response to number 2 with you 24 today to this deposition? 25 A. No.</p>	<p style="text-align: right;">Page 101</p> <p>1 out. You did not bring that -- those receipts with you 2 today either, did you? 3 A. That is correct. I thought that -- I thought 4 that he had it and he did not have it. When I went 5 looking for it it was not there. 6 Q. So, therefore, you do not have those 7 receipts? 8 A. Correct. I thought I had but it was not 9 there. I did not have it. 10 Q. And the same question; you have not 11 transferred or provided those to anybody, do you know of 12 any place that those receipts might exist in any form? 13 A. No. 14 Q. Number 3, did you bring -- did you bring 15 anything with you today that isn't -- that is in direct 16 reference to number 3? 17 A. There were the two letters that you have in 18 front of you. 19 Q. Anything else? 20 A. No. 21 Q. Wouldn't the draft of affidavit if you have 22 such a draft affidavit be within number 3? 23 A. Yes, if I had it. 24 Q. So, since you did not bring it, can we safely 25 assume you do not have it?</p>

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<p style="text-align: right;">Page 102</p> <p>1 A. We could assume that, yes.</p> <p>2 MS. JOHNSON: I'll state in my place that</p> <p>3 there was no draft.</p> <p>4 THE WITNESS: Yes. Because I honestly don't</p> <p>5 recall one.</p> <p>6 BY MR. BRAVE:</p> <p>7 Q. Number 4, anything responsive to number 4?</p> <p>8 A. Other than those two letters, that what I</p> <p>9 gave to you.</p> <p>10 Q. Anything in response to number 8?</p> <p>11 A. No.</p> <p>12 Q. Do you know of the existence of anything that</p> <p>13 would be responsive to number 8 in anyone's possession</p> <p>14 other than Taser International?</p> <p>15 A. Not to my knowledge.</p> <p>16 Q. Number 12. Did you bring anything with you</p> <p>17 today in response to number 12?</p> <p>18 MR. REDHAIR: I may have instructed her not</p> <p>19 to -- let me read that again.</p> <p>20 To be honest, I can't remember. It's Monday</p> <p>21 morning and I'm having a difficult time figuring out</p> <p>22 what that's asking for. I'm sorry.</p> <p>23 MR. BRAVE: I don't want to ask her this.</p> <p>24 When you communicated that to her not to bring it, did</p> <p>25 you do that in written form or do you have any way of</p>	<p style="text-align: right;">Page 104</p> <p>1 Q. And do you know of anything that is in</p> <p>2 existence other than possibly at Taser International</p> <p>3 anywhere?</p> <p>4 A. Not to my recollection. Not to my knowledge.</p> <p>5 Q. Now, going through the ones that he</p> <p>6 instructed you not to bring the items to, number 5, do</p> <p>7 you have anything that would have complied with number 5</p> <p>8 in your possession?</p> <p>9 MR. REDHAIR: I'm going to tell her not to</p> <p>10 answer that.</p> <p>11 What I propose we do is I just don't think</p> <p>12 those things are relevant or designed to lead to the</p> <p>13 discovery of relevant information, so if you could write</p> <p>14 me a letter explaining why it's relevant I'll revisit it</p> <p>15 and then if I determine that it is discoverable we can</p> <p>16 reconvene on this deposition. If I think it's, as I do</p> <p>17 now, not relevant, not discoverable, then you can make a</p> <p>18 decision to talk to the judge about it. That's the way</p> <p>19 I propose we handle it.</p> <p>20 MR. BRAVE: Well, I'm assuming that</p> <p>21 Ms. Johnson does not want to fly back to Scottsdale to</p> <p>22 continue this, so --</p> <p>23 MR. REDHAIR: Well, we can do it</p> <p>24 telephonically or we can do it by videotape. I mean,</p> <p>25 you've got your chance to eyeball the witness, which is</p>
<p style="text-align: right;">Page 103</p> <p>1 memorializing that or --</p> <p>2 THE WITNESS: No, I don't have any way of</p> <p>3 memorializing it.</p> <p>4 MR. BRAVE: Do you object to her answering</p> <p>5 number 12 at this time or are you going to instruct her</p> <p>6 not to answer?</p> <p>7 MR. REDHAIR: Well, I mean, she can talk</p> <p>8 about it. Well, let me read it.</p> <p>9 Why don't you explain to me what this is</p> <p>10 trying to get at, if you don't mind?</p> <p>11 MR. BRAVE: Well, my first question is I need</p> <p>12 to know whether or not you instructed her not to bring</p> <p>13 these things because if you did then it's a moot point.</p> <p>14 THE WITNESS: I've read it three times and I</p> <p>15 can't understand what this is asking. I think I</p> <p>16 probably did based on that. I think I did instruct her</p> <p>17 not to --</p> <p>18 BY MR. BRAVE:</p> <p>19 Q. Okay. Number 13.</p> <p>20 MR. REDHAIR: -- bring anything.</p> <p>21 BY MR. BRAVE:</p> <p>22 Q. Number 13. Do you understand you were to</p> <p>23 bring with you anything relative to number 13 and in</p> <p>24 compliance therewith?</p> <p>25 A. Yes. Yeah, but I don't have anything.</p>	<p style="text-align: right;">Page 105</p> <p>1 typically what's the most important thing.</p> <p>2 So, no. I mean, she's not going to be</p> <p>3 talking about her medical conditions, her medical</p> <p>4 treatment, any finances, that sort of stuff short of me</p> <p>5 being convinced that it's somehow relevant.</p> <p>6 MR. BRAVE: So you're instructing her not to</p> <p>7 answer anything with regard to number 5 on Exhibit 2?</p> <p>8 MR. REDHAIR: Correct.</p> <p>9 MR. BRAVE: Are you instructing her not to</p> <p>10 answer anything regarding number 6 on number 2 -- on</p> <p>11 Exhibit 2?</p> <p>12 MR. REDHAIR: Six, 7, 9, 10, 11, 14, 15 and</p> <p>13 16.</p> <p>14 MR. BRAVE: So you are instructing her to not</p> <p>15 answer any questions regarding them?</p> <p>16 MR. REDHAIR: Yes.</p> <p>17 MR. BRAVE: And obviously we reserve the</p> <p>18 right to reconvene this deposition once you get up to</p> <p>19 speed on the case.</p> <p>20 MR. REDHAIR: Certainly. And you don't need</p> <p>21 to reserve it. I'll stipulate I'll do it if I'm</p> <p>22 convinced that I need to.</p> <p>23 MR. BRAVE: Well, with education, I need to</p> <p>24 convince the judge.</p> <p>25 MR. REDHAIR: Okay.</p>

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<p style="text-align: right;">Page 106</p> <p>1 BY MR. BRAVE: 2 Q. Anyway, Ms. Schreiner, once you were working 3 on the Volunteer Exposure Reports what was your 4 procedure? 5 If a report came in, what would you do it 6 with it? 7 A. I would review it and I would take the 8 information and take it from the exposure report and put 9 it into the spreadsheet. 10 Q. Anything else you did with them? 11 A. Depending on some of the -- the Field Use 12 Reports I would actually give to someone in -- like 13 either Rick Gibeaut or who at the time was in the 14 Training Department and ask him to review it prior to. 15 Q. Did you establish a numbering system for the 16 Volunteer Exposure Reports? 17 A. At one point towards the end of 2004, late 18 fall of 2004 I had suggested that they create a 19 numbering system like a Bates system or something to 20 number the forms because, you know, that way you knew 21 that there was a chronological order to them. 22 Q. And when was that? 23 A. That was in late 2004. 24 Q. Can you narrow it? 25 A. The fall. It was fall of 2004. I don't</p>	<p style="text-align: right;">Page 108</p> <p>1 Q. Your Social Security number? 2 MR. REDHAIR: You don't have to give that out 3 if you don't want to. 4 THE WITNESS: I would rather not. 5 MR. BRAVE: You're instructing her not to 6 answer? 7 MR. REDHAIR: Yes. 8 BY MR. BRAVE: 9 Q. Your present address? 10 A. 3731 East Renee Drive, Phoenix. East Renee, 11 R-E-N-E-E, Drive, Phoenix, Arizona, 12 Q. Zip Code? 13 A. Oh, I'm sorry. 85050. 14 Q. Your place of birth? 15 A. Illinois. 16 Q. Where in Illinois? 17 A. It was Kankakee County. 18 Q. Was there a city in Kankakee County? 19 A. Watseka. 20 Q. Which facility in Watseka? 21 A. I -- 22 MR. REDHAIR: You don't have to answer that. 23 MR. BRAVE: Are you instructing her not to 24 answer? 25 MR. REDHAIR: Yes. I'm instructing her not</p>
<p style="text-align: right;">Page 107</p> <p>1 recall the date, but it was some time in the fall of 2 2004. 3 Q. Would it have been -- would it be safe to say 4 October 1st or later 2004 but yet in 2004? 5 MR. REDHAIR: Object to the form. 6 THE WITNESS: It could have been. 7 BY MR. BRAVE: 8 Q. When else? 9 A. But I just -- I don't know. It was in the 10 fall of 2004. It could have been September. 11 I know that there was a young girl from 12 Minnesota, I don't recall her name, who came down and 13 actually helped me with the process. 14 Q. But it was in the fall of 2004, correct? 15 A. That I recall, yes. 16 MR. BRAVE: I'm probably going to go into a 17 whole bunch of areas that you're going to instruct her 18 not to answer. 19 MR. REDHAIR: Okay. 20 MR. BRAVE: If we can just try to do it 21 efficiently, I'll try to speed through this. 22 Q. Ms. Schreiner, what is your full name? 23 A. Pamela J. Schreiner. 24 Q. And your date of birth? 25 A. June 15, 1964.</p>	<p style="text-align: right;">Page 109</p> <p>1 to answer. 2 BY MR. BRAVE: 3 Q. What are your parents' names, full names? 4 MR. REDHAIR: What is the relevance of this? 5 THE WITNESS: I would rather not give out my 6 parents' names. 7 MR. REDHAIR: Yes. What is the relevance? 8 MR. BRAVE: Just going through a complete and 9 full deposition. 10 MR. REDHAIR: Okay. 11 BY MR. BRAVE: 12 Q. What are your parents' full names? 13 MR. REDHAIR: You don't need to answer that 14 if you don't want to. 15 THE WITNESS: I would rather not. 16 MR. REDHAIR: Okay. I'm instructing her not 17 to answer. 18 BY MR. BRAVE: 19 Q. Where do your parents live? 20 MR. REDHAIR: Before we go down this road too 21 far, there is a four hour limit, presumptive limit of 22 depositions in Arizona. Typically -- 23 MS. GIBEAUT: We are in federal court. 24 There's a seven hour limit. 25 MR. REDHAIR: Okay.</p>

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<p style="text-align: right;">Page 110</p> <p>1 BY MR. BRAVE: 2 Q. Where do they live, your parents? 3 A. In Phoenix. 4 Q. What are their address? 5 A. I would rather not give that out. 6 MR. REDHAIR: I'm instructing her not to 7 answer. 8 BY MR. BRAVE: 9 Q. Do you have any siblings? 10 A. Yes. 11 Q. What are their names? 12 A. Debbie and Laurie. 13 Q. What are their dates of birth? What are 14 their full names? 15 A. Deb Marsh and Laura Parsons. 16 Q. And where do they live? 17 A. Phoenix, Arizona and Chicago, Illinois. 18 Q. Do you know their addresses? 19 A. No. I don't off the top of my head. 20 Q. What is your full maiden name? 21 A. I don't really want to give out my 22 information. 23 Q. I understand that. 24 MR. REDHAIR: I'll instruct her not to 25 answer.</p>	<p style="text-align: right;">Page 112</p> <p>1 answer. 2 BY MR. BRAVE: 3 Q. Have you ever used any other Social Security 4 number other than the one you have right now? 5 A. Absolutely not. 6 Q. What high school did you attend? 7 A. McHenry East Campus. 8 Q. Where is that located? 9 A. McHenry, Illinois. 10 Q. Was that for the entire duration of high 11 school? 12 A. No. 13 Q. What other high school did you attend? 14 A. Marion Central Catholic High School in 15 Woodstock, Illinois. 16 Q. Which years did you attend each of those? 17 Any other facilities that you attended high school? 18 A. That was it. The two -- I went to Marion 19 Central High School for the first two years of my high 20 school. I think it was 1978 'til 1980. 1980. And then 21 I went to McHenry from 1980 'til 1982. 22 Q. Do you remember the date of your graduation? 23 A. I left McHenry High School in January of 24 1982. 25 Q. Did you graduate when you left?</p>
<p style="text-align: right;">Page 111</p> <p>1 I mean, I think we're wasting time. We can 2 sit here for seven hours if you think that's necessary. 3 MR. BRAVE: So, just to be clear, you're 4 instructing her not to answer? 5 MR. REDHAIR: Yes. 6 BY MR. BRAVE: 7 Q. Have you ever used any aliases or any other 8 names? 9 A. No. 10 Q. Okay. First have you ever used any aliases? 11 A. No. My name -- 12 Q. Have you ever used any names other than the 13 one you're using here today? 14 A. Yes. My maiden name and my previously 15 married name. 16 Q. So there are two other names that you have 17 used? 18 A. Yes. 19 Q. And are you going to give me those or is your 20 attorney going to instruct you not to give me those? 21 A. I would rather not give them out. 22 Q. Is your attorney going to instruct you not to 23 give me those? 24 A. I would ask for him to, yes. 25 MR. REDHAIR: Yes, I instruct her not to</p>	<p style="text-align: right;">Page 113</p> <p>1 A. Not from McHenry, no. 2 Q. Where did you graduate? Where did you next 3 go to attend high school? 4 A. I actually did on-line school with John Adams 5 High School. 6 Q. And when did you graduate? 7 A. Just recently. 8 Q. With your high school diploma? 9 A. Yes, I did. 10 Q. How long ago was "recently"? 11 A. May. 12 Q. Did you have any specialty throughout high 13 school such as college prep or vocational? 14 A. Yes. I did go to junior college. 15 Q. Now, during high school did you have any 16 specialty field that you were pursuing such as -- 17 A. Oh, I'm sorry. I'm sorry. I misunderstood 18 you. 19 Q. That's all right. That's fine. 20 Either college prep or vocational or anything 21 else? 22 A. Not really. I -- I just wanted to get 23 through junior college of some kind, business. 24 Q. What colleges have you attended? 25 A. McHenry Community College in Crystal Lake.</p>

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<p style="text-align: right;">Page 114</p> <p>1 Q. When was that? 2 A. 1982 on and off for a few years. I went 3 there for a few years on and off. 4 I also attended Elgin Community College in 5 Elgin, Illinois, took a couple classes there. 6 I attended Paradise Valley Community College 7 here with some courses on and off. 8 Q. What were your majors or specialty fields of 9 interest? 10 A. Mostly business. Administration, that type. 11 Q. Any other specialty? 12 A. At one point I did want to go into paralegal, 13 to become a paralegal. 14 Q. Any other specialties? 15 A. No. 16 Q. Did you graduate from any of those 17 institutions? 18 A. No. 19 Q. Do you hold any degree other than your high 20 school degree? 21 A. No. 22 Q. Did you make any friends in college that 23 you've maintained contact post-college for the 24 long-term? 25 MR. REDHAIR: Object to form.</p>	<p style="text-align: right;">Page 116</p> <p>1 Q. Can you bracket a time-frame for when you 2 took those additional skill development education 3 programs? 4 A. It was from 1982 until current. 5 Q. Switching gears to health history, which I 6 know where you're going to go but I will just start in 7 anyway. Have you had any serious health issues since 8 2000? 9 MR. REDHAIR: Don't answer that. 10 THE WITNESS: No. 11 MR. BRAVE: So you are going to instruct her 12 not to answer anything on health? 13 MR. REDHAIR: Yes. Subject to what I said 14 earlier. 15 BY MR. BRAVE 16 Q. Switching to family information, how many 17 children do you have -- 18 A. Three. 19 Q. -- or have you had? 20 A. Three. 21 Q. What are their full names? 22 A. Justin, Matthew and Jessica. 23 Q. All with the same last name? 24 A. Yes. 25 Q. Which is?</p>
<p style="text-align: right;">Page 115</p> <p>1 BY MR. BRAVE: 2 Q. You can answer. 3 A. Not really. 4 Q. Not really. Does that mean you did or you 5 didn't? 6 A. I haven't communicated -- I don't communicate 7 with people. I don't really -- I don't associate too 8 much with people. 9 Q. Do you have any skill development education 10 beyond the education we've just discussed? 11 A. I -- I would say no. I am good with 12 computers. I specialize in things like that, the Word, 13 Excel, PowerPoint, secretarial type duties. 14 Q. Are you good with Word? 15 A. Yes. 16 Q. With Outlook? 17 A. Yes. 18 Q. Any other skill development beyond those 19 other than what we've already discussed? 20 A. No. 21 Q. Who -- did you pay yourself for that 22 additional development or did someone else or some other 23 entity pay for it? 24 A. No. For the most part I paid for everything 25 myself.</p>	<p style="text-align: right;">Page 117</p> <p>1 A. It's Schaffter. 2 Q. It's what? 3 A. Schaffter. 4 Q. Can you spell that for the court reporter, 5 please? 6 A. S-C-H-A-F-F-E-R. 7 Q. What are their dates of birth? 8 A. I would rather -- 9 MR. REDHAIR: Don't answer that. 10 BY MR. BRAVE: 11 Q. Where do each of them live? 12 A. In Phoenix. 13 Q. What are their addresses? 14 A. Two live with me and my daughter lives 15 elsewhere. 16 Q. Where does she live? 17 MR. REDHAIR: You don't need to answer that 18 if you don't want to. 19 THE WITNESS: I would rather not. 20 MR. REDHAIR: Okay. Then don't. 21 MR. BRAVE: So you're instructing her not to 22 answer? 23 MR. REDHAIR: Yes. 24 BY MR. BRAVE: 25 Q. Are they working or in school or a</p>

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<p style="text-align: right;">Page 118</p> <p>1 combination of both?</p> <p>2 A. A combination of both for two of them.</p> <p>3 Q. Which two?</p> <p>4 A. My two sons.</p> <p>5 Q. Where do they work?</p> <p>6 A. I would rather not say.</p> <p>7 MR. REDHAIR: Don't answer that then. I am 8 instructing you not to answer.</p> <p>9 BY MR. BRAVE:</p> <p>10 Q. Where do they go to school?</p> <p>11 A. I would rather not really say.</p> <p>12 MR. REDHAIR: The same.</p> <p>13 BY MR. BRAVE:</p> <p>14 Q. And your daughter, what does she do, work or 15 go to school?</p> <p>16 A. She works.</p> <p>17 Q. Where?</p> <p>18 A. I would rather not discuss that.</p> <p>19 MR. REDHAIR: Then don't. I'm instructing 20 her not to.</p> <p>21 BY MR. BRAVE:</p> <p>22 Q. Switching to marriage history, when were you 23 first married, what date?</p> <p>24 A. April 11th.</p> <p>25 Q. What year?</p>	<p style="text-align: right;">Page 120</p> <p>1 Phoenix, Arizona</p> <p>2 December 3, 2007</p> <p>3 1:47 p.m.</p> <p>4</p> <p>5</p> <p>6 (Deposition Exhibit Numbers 3 through 22, 7 inclusive, were then marked for 8 identification.)</p> <p>9 MR. KYLER: We're back on the record. The 10 time is 1:47.</p> <p>11</p> <p>12 PAMELA J. SCHREINER, 13 called as a witness herein, having been previously duly 14 sworn, was examined and testified as follows:</p> <p>15</p> <p style="text-align: center;">EXAMINATION</p> <p>16 BY MR. BRAVE:</p> <p>17 Q. Allow the record to reflect that Scott Link 18 has left and Doug Clint has joined us as corporate 19 representative for Taser International.</p> <p>20 Mr. Court Reporter, I believe you had a 21 question.</p> <p>22 THE REPORTER: I've already got it.</p> <p>23 MR. BRAVE: You've got the answer. Okay.</p> <p>24 Q. Ms. Schreiner, is there anything that you --</p>
<p style="text-align: right;">Page 119</p> <p>1 MR. REDHAIR: Let's take a quick break.</p> <p>2 THE WITNESS: 1983.</p> <p>3 MR. REDHAIR: Do you want to break for lunch 4 or do you want to just take five?</p> <p>5 MR. BRAVE: Break for lunch.</p> <p>6 MR. KYLER: We're going off the record. The 7 time is 12:25.</p> <p>8 (Whereupon, the deposition was then 9 recessed at 12:25 p.m. until 10 1:47 p.m.)</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 121</p> <p>1 is there anything at this point that you would like to 2 correct or change regarding your prior testimony today?</p> <p>3 A. No, sir.</p> <p>4 Q. During the lunch break did you have any 5 conversations either with or in the presence of 6 Ms. Johnson?</p> <p>7 A. We had conversation, yes, but --</p> <p>8 Q. Did any of that conversation pertain at all 9 in any way to your testimony -- to your answers to this 10 case in the broadest possible sense?</p> <p>11 A. No.</p> <p>12 Q. So you did not discuss anything regarding 13 your testimony in this case at all during the lunch 14 break --</p> <p>15 A. No.</p> <p>16 Q. -- in Ms. Johnson's presence?</p> <p>17 A. No.</p> <p>18 Q. Have you had any --</p> <p>19 MR. REDHAIR: And just for the record, I 20 called my sister who's an FBI agent, and just -- she 21 didn't talk to her but just so you're clear.</p> <p>22 MR. BRAVE: That's fine.</p> <p>23 Q. Have you had -- other than what you've 24 testified to here today, have you had any other 25 communications with any other attorneys and/or their</p>

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1 staff to your knowledge regarding Taser International,
 2 Taser devices, Taser litigation, et cetera in the
 3 broadest possible sense?

4 A. I was deposed a month ago from another law
 5 firm.

6 Q. Let me shorten it. Other than that
 7 deposition and what you testified to there and what you
 8 testified to here today, any others?

9 A. No.

10 Q. Have you ever had any communications with
 11 Mr. John Dillingham?

12 A. Yes. But that was in the Powers case. I'm
 13 sorry. Yes.

14 Q. But that was only in the Powers case when
 15 Taser's attorneys were present?

16 A. Yes.

17 Q. Nothing outside of that?

18 A. Not that I recall.

19 Q. And what about Mr. Tom Wilmer; the same
 20 series of questions?

21 A. No.

22 Q. Regarding the statements you made regarding
 23 document shredding, did you ever notify anyone at the
 24 Securities and Exchange Commission or tell them anything
 25 regarding your statements regarding document shredding?

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1 A. Not that I recall.

2 Q. How about Department of Justice?

3 A. Not that I recall.

4 Q. How about the FBI?

5 A. I would rather not answer that. That was
 6 part of the investigation.

7 Q. Okay. I'm asking for a yes or no question --
 8 the answer. Did you or did you not discuss with them
 9 the statements you've made regarding the document
 10 shredding by either Rick Smith and/or Doug Klint?

11 MR. REDHAIR: I'm going to instruct her not
 12 to answer. She was told by the FBI not to discuss the
 13 case or the investigation, so I'm instructing her not to
 14 answer.

15 MR. BRAVE: And just to be clear, the only
 16 basis upon which you're making that statement is based
 17 upon not your direct knowledge but upon what
 18 Mrs. Schreiner said, correct?

19 MR. REDHAIR: Correct. And what I have
 20 learned in the conversation with my sister about the FBI
 21 protocol.

22 MR. BRAVE: Okay. But that was only about
 23 the protocol. It had nothing to do with the direct
 24 conversation and/or meetings that Ms. Schreiner had with
 25 the FBI agents correct?

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1 MR. REDHAIR: I don't think I'm being deposed
 2 and I don't think I understand that question.
 3 I'm instructing her not to answer based on
 4 the representation by the FBI agent not to discuss the
 5 case.

6 MR. BRAVE: Okay. Here's the point I'm
 7 making. The only knowledge you have regarding that
 8 supporting instruction not to answer is -- specifically
 9 pertains to Ms. Schreiner, her communications with the
 10 FBI are her assertions that they told her, instructed
 11 her not to answer any questions regarding that, correct?

12 MR. REDHAIR: And the conversation with an
 13 FBI agent over the lunch hour where they informed me
 14 that they frequently tell witnesses not to discuss the
 15 case.

16 MR. BRAVE: Right. The distinction I'm
 17 getting at is the discussion -- and I'm not deposing
 18 you. I just want it clear on the record. The
 19 discussion you're talking about did not have anything
 20 specifically to do was Ms. Schreiner and her contacts
 21 with the FBI?

22 MR. REDHAIR: Correct.

23 BY MR. BRAVE:

24 Q. Ms. Schreiner, during your time when you were
 25 working at Taser were you on any kind of medication or

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1 anything else that would have impaired your ability to
 2 work or your cognitive abilities at any time during your
 3 period of employment at Taser?

4 MR. REDHAIR: I'm going to instruct her not
 5 to answer that.

6 BY MR. BRAVE:

7 Q. Was there any factor that you can recall
 8 during your period of employment with Taser that you
 9 experienced that would have in any way limited or
 10 impaired your ability to work and/or your cognitive
 11 ability?

12 MR. REDHAIR: Could you repeat that?

13 BY MR. BRAVE:

14 Q. At any time during your employment with Taser
 15 while you were working was there any factor that you can
 16 mention in the broadest possible sense that could have
 17 had a negative impact on your ability to work or your
 18 cognitive ability?

19 MR. REDHAIR: Excluding medical, right,
 20 because I've --

21 MR. BRAVE: If you wish to object, object.
 22 If you wish to instruct her not to answer, do so.

23 MR. REDHAIR: Object to form.

24 Do you feel comfortable answering that?

25 THE WITNESS: Well, other than medical, no.

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<p style="text-align: right;">Page 126</p> <p>1 BY MR. BRAVE: 2 Q. So, other than medical, no, correct? 3 A. Correct. 4 MR. BRAVE: And you're instructing her not to 5 answer anything regarding medical? 6 MR. REDHAIR: Right. And you may want to 7 follow -- okay. Correct.</p> <p>8 BY MR. BRAVE: 9 Q. Is there anything regarding any potential 10 medical issue that may have had a negative impact on 11 your ability to work and/or cognitive abilities during 12 your employment at Taser International?</p> <p>13 MR. REDHAIR: Don't answer that. She's not 14 going to discuss any of her medical records or 15 conditions.</p> <p>16 MR. BRAVE: The only reason I asked that 17 question is because of the statement you began to make 18 and then stopped. I thought there was something I'm 19 missing.</p> <p>20 MR. REDHAIR: There's not. But she's not 21 going to discuss any medical conditions.</p> <p>22 BY MR. BRAVE: 23 Q. Going back to the outline, when were you 24 first married, the date?</p> <p>25 A. My previous husband, or my current husband</p>	<p style="text-align: right;">Page 128</p> <p>1 Q. How many? 2 A. Three. 3 Q. What were their -- are these the same three 4 children you have now? 5 A. Yes. 6 Q. When did you separate from him? 7 MR. REDHAIR: Just the date? 8 MR. BRAVE: Yes. 9 THE WITNESS: It was in 1990.</p> <p>10 BY MR. BRAVE: 11 Q. Did you divorce? 12 A. Yes, we did. 13 Q. And what date was the divorce? 14 A. November 25, 1991. 15 Q. In what court? 16 A. McHenry County. 17 Q. Illinois? 18 A. Yes. 19 Q. And did you have a second marriage? 20 A. Yes. 21 Q. And what is the date of that second marriage? 22 A. October 16, 1993. 23 Q. And what is that husband's name? 24 A. Michael Schreiner. 25 Q. And his middle name?</p>
<p style="text-align: right;">Page 127</p> <p>1 rather? 2 Q. When was your first -- what is the date of 3 the first marriage that you may have entered into? 4 A. April 11, 1982. 5 Q. And what was the name of that husband? 6 A. Steve. 7 Q. What was his full name? 8 A. I would rather not answer that. I -- I 9 really don't want to answer that question. If I must I 10 will, but I'd rather not.</p> <p>11 MR. REDHAIR: Let's answer it now. 12 THE WITNESS: Okay. It's Steven Schaffter.</p> <p>13 BY MR. BRAVE: 14 Q. Steven with a V or a P-H? 15 A. V. 16 Q. What was his middle name? 17 A. Roger. 18 Q. And how do you spell his last name? 19 A. S-C-H-A-F-F-T-E-R. 20 Q. And what was his date of birth? 21 A. February 14, 1963. 22 Q. And where were you married? 23 A. In McHenry, Illinois. 24 Q. Did you have any children with that husband? 25 A. Yes.</p>	<p style="text-align: right;">Page 129</p> <p>1 A. Eric. 2 Q. And I'm assuming that's your present husband? 3 A. Yes. 4 Q. What is Mr. Schreiner's date of birth? 5 A. I would really not want to give that out. 6 MR. REDHAIR: I'll instruct her not to 7 answer. 8 BY MR. BRAVE: 9 Q. Did you have any children with Mr. Schreiner? 10 A. No. 11 Q. Do you have any children other than those 12 you've previously identified today? 13 A. No. 14 Q. Have you had any other husbands other than 15 those two? 16 A. No. 17 Q. We already know what your current residence 18 is. When did you move into your current residence? 19 A. July of 2004. 20 Q. And where did you live prior to that? 21 A. 3942 East Westcott Drive, Phoenix, Arizona 22 85050. 23 Q. And did you move contemporaneously from one 24 location, from one address to the other? 25 A. I'm sorry. Could you repeat that?</p>

33 (Pages 126 to 129)

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<p style="text-align: right;">Page 130</p> <p>1 Q. Did you basically move from one home to the 2 other without a large gap in time? 3 A. Yes. 4 Q. Your present home, do you own or rent? 5 A. Own. 6 Q. Your previous home, did you own or rent? 7 A. Own. 8 Q. Prior to your previous home where did you 9 live? 10 A. I don't recall the address but it was in 11 Phoenix. 12 Q. What time-frame would that have been in? 13 A. It would have been 1994 to 1995. 14 Q. Where do you presently work? 15 A. I have two jobs. My full-time job is Naumann 16 Hobbs Material Handling. 17 Q. And what do you do with them? 18 A. I am a Field Service Supervisor. 19 Q. And what do your duties consist of? 20 A. Basically payroll. I supervise the staff, I 21 mail reports, I invoice. I do just a number of 22 different administrative type duties. 23 Q. What is their address? 24 A. 40 -- 43rd Street and Broadway. I can't 25 think of it. 4331 East 43rd Street I think.</p>	<p style="text-align: right;">Page 132</p> <p>1 THE WITNESS: I did that. 2 MR. REDHAIR: What was the other one? 3 MR. BRAVE: Name of immediate supervisor. 4 MR. REDHAIR: Okay. 5 THE WITNESS: Scott Hunt. 6 BY MR. BRAVE: 7 Q. And what is his title? 8 A. Service Manager. 9 Q. Who's the person who is in charge of the 10 entire business? 11 A. I -- I don't know. There's several officers 12 of the company. So I don't know. I don't actually 13 speak to them. I don't -- I don't really know. I've 14 only been there a short time, so -- 15 Q. When did you start there? 16 A. In July. The end of July, 2007. 17 Q. And you've mentioned a second employer. 18 Who's that? 19 A. Bed, Bath & Beyond. 20 Q. What's their address or where are they 21 located? 22 A. Scottsdale Road and the 101 in Scottsdale, 23 Arizona. 24 Q. And who's your immediate supervisor there? 25 A. Glenn Johnson.</p>
<p style="text-align: right;">Page 131</p> <p>1 Q. In what city? 2 A. Phoenix, Arizona. 3 Q. And the phone number for the office? 4 A. I -- (602) 346-2214. 5 Q. Who is your immediate supervisor at that 6 employer? 7 A. Do I need to really give that out? 8 MR. REDHAIR: I mean, he's entitled to get 9 some background. 10 Here's the problem. She is concerned about 11 the harassment that she's perceived and so she's having 12 a difficult time deciding, you know, information to give 13 out. So I don't want to be obstructionist, but I want 14 you to understand her concern. 15 MR. BRAVE: I understand. My concern is that 16 we are entitled to this information and our position is 17 that she may have been involved in actions that cost 18 this company hundreds of millions of dollars and there 19 are things and her previous statements and what has 20 transpired that simply do not make sense and, therefore, 21 we are entitled to explore into those areas. 22 MR. REDHAIR: Okay. I mean, I would -- if 23 you feel comfortable telling the telephone number make 24 that -- 25 MR. BRAVE: She already gave that.</p>	<p style="text-align: right;">Page 133</p> <p>1 Q. What do you do for them? 2 A. I'm a cashier. 3 Q. When did you start there? 4 A. September of 2007. 5 Q. Going back in time chronologically, where did 6 you work prior to these two -- prior to these two 7 locations? 8 A. I worked at Arnold Machinery. 9 Q. What -- do you know where are they located? 10 A. Laveen, Arizona. 6024 West Southern Avenue. 11 Q. Who was your immediate supervisor? 12 A. Will Long was the branch manager. I don't 13 know if he's still there, but -- 14 Q. What was your job title? 15 A. Office Manager. 16 Q. And what did you -- what was your job 17 description? What did you do for them? 18 A. Basically the same thing I'm doing now; 19 payroll, invoicing, filing, any administrative type 20 duties. 21 Q. When did you start with them? 22 A. In September of 2005. 23 Q. And when did you leave their employ? 24 A. May of 2007. 25 Q. What was the reason for leaving?</p>

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<p style="text-align: right;">Page 134</p> <p>1 A. The division was eliminated because of the 2 economy.</p> <p>3 Q. Were you at any time while employed with them 4 accused of poor work, dishonesty, inability to get along 5 or anything like that?</p> <p>6 A. No.</p> <p>7 Q. Prior to that employer where did you work?</p> <p>8 A. Quality Building Maintenance.</p> <p>9 Q. And during what time period did you work 10 there?</p> <p>11 A. May of 2005 'til September of 2005.</p> <p>12 Q. Where are they located?</p> <p>13 A. They were in Tempe. I don't know that they 14 are still in business.</p> <p>15 Q. What was your job with them?</p> <p>16 A. Basically it was a girl Friday office type.</p> <p>17 Q. Who was your immediate supervisor?</p> <p>18 A. His name was Wade Hardy.</p> <p>19 Q. And do you know who owned that business --</p> <p>20 A. He did.</p> <p>21 Q. -- or who was the principal person?</p> <p>22 A. He did.</p> <p>23 Q. Why did you leave their employ?</p> <p>24 A. Because my paychecks were bouncing.</p> <p>25 Q. At any time were you accused of poor work,</p>	<p style="text-align: right;">Page 136</p> <p>1 Q. Did it have absolutely anything to do with 2 you in any way, shape or form?</p> <p>3 A. No.</p> <p>4 Q. Were you accused of any wrongdoing while at 5 Prepaid Legal?</p> <p>6 A. No.</p> <p>7 Q. So, just to be clear, you were not accused of 8 embezzlement while at Prepaid Legal?</p> <p>9 A. No.</p> <p>10 MR. BRAVE: My next section is family 11 finances. Do you want me to go through each question or 12 do you want just instruct her not to answer?</p> <p>13 MR. REDHAIR: Yes, I'm going to instruct her 14 not to answer and you can deal with them.</p> <p>15 MR. BRAVE: The next section is asset 16 inventory.</p> <p>17 MR. REDHAIR: The same.</p> <p>18 MR. BRAVE: Next group is inventory 19 communication devices.</p> <p>20 MR. REDHAIR: I don't understand.</p> <p>21 MR. BRAVE: Such as how many computers in the 22 household, who they belong to, et cetera.</p> <p>23 MR. REDHAIR: Yes, the same on that.</p> <p>24 MR. BRAVE: Next area is investments.</p> <p>25 MR. REDHAIR: The same.</p>
<p style="text-align: right;">Page 135</p> <p>1 dishonest dealing, inability to get along, et cetera 2 while employed with them?</p> <p>3 A. No, no.</p> <p>4 Q. And prior to working with them where did you 5 work?</p> <p>6 A. I -- that was pretty much it. I was at Taser 7 International.</p> <p>8 Q. Did you ever work with anybody called Prepaid 9 Legal?</p> <p>10 A. Yes.</p> <p>11 Q. When was that?</p> <p>12 A. June of 2002 until March of 2004.</p> <p>13 Q. Did you have -- personally have any 14 complaints against Prepaid Legal, the company?</p> <p>15 A. No.</p> <p>16 Q. Were there any employees at Prepaid Legal 17 that you were particularly close to, any co-workers?</p> <p>18 A. Well, I basically talked with everybody. I 19 was their supervisor of the staff and that's it.</p> <p>20 Q. Have you had any contact with anybody from 21 Prepaid Legal after you left Taser International?</p> <p>22 A. I would occasionally see people in the mall 23 or something and at one point I actually contacted one 24 of the attorneys for my mom and dad for a personal issue 25 they had to see if they could help them.</p>	<p style="text-align: right;">Page 137</p> <p>1 MR. BRAVE: Next area is tax returns.</p> <p>2 MR. REDHAIR: Yes, the same.</p> <p>3 BY MR. BRAVE:</p> <p>4 Q. Getting back to Prepaid Legal, how did you 5 end up applying for a job with them?</p> <p>6 A. I answered -- I responded to an ad. I don't 7 recall if it was in the newspaper or on-line. I just -- 8 I recall responding to an ad, sending my resume.</p> <p>9 Q. Did you ever work for a law firm called 10 Parker Stanbury?</p> <p>11 A. That was Prepaid Legal, yes.</p> <p>12 Q. So while you were at Parker Stanbury you were 13 actually working for Prepaid Legal?</p> <p>14 A. Parker Stan -- Parker Stanbury had the 15 contract for Prepaid Legal.</p> <p>16 Q. Did you end up applying for a job directly 17 with Parker Stanbury law firm?</p> <p>18 A. Not -- well, when I responded to the ad it 19 didn't actually say Parker Stanbury, so when I responded 20 to it one of the attorneys from there contacted me and I 21 found out then. My paychecks came from Parker Stanbury 22 but it was because of the Prepaid Legal contract that 23 the position was there.</p> <p>24 Q. So, if I understand you correctly, you 25 applied for a job with Parker Stanbury but you did not</p>

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<p style="text-align: right;">Page 138</p> <p>1 accept a job with Parker Stanbury? 2 A. I did. I worked for Parker Stanbury because 3 of the Prepaid Legal contract. 4 Q. Did you have any previous legal experience 5 before working for Prepaid Legal? 6 A. No. 7 Q. Did you have any previous legal experience 8 before working at Parker Stanbury? 9 A. No. 10 Q. Did anyone inform you that there was a 11 position open at Parker Stanbury prior to applying for 12 it? 13 A. No. 14 Q. Did you have any referral help at all for 15 that job? 16 A. No. 17 Q. Did you have any interviews for that job? 18 A. Yes. 19 Q. What was the name of the person that 20 interviewed you for that job? 21 A. Mike Fuller and Stacey Fuller. 22 Q. What was your title with that organization? 23 A. Legal administrator. 24 Q. What tasks were you involved in in your job? 25 A. Basically supervising the staff and</p>	<p style="text-align: right;">Page 140</p> <p>1 of them? 2 A. Probably February of 2004. That was 3 Mr. Lopresti I met with. 4 Q. Were there any attorneys at Parker Stanbury 5 who you felt did not like you or the job you were doing 6 for any reason? 7 A. No. 8 Q. For any lawyer who has advised you, paid or 9 for free, since January, 2004 please provide the 10 following: First the name of the law firm? 11 A. I'm not sure I understand. I'm sorry. 12 Q. Has there been any attorney who has advised 13 you, paid or for free, since January, 2004 on any issue? 14 A. No. 15 MR. REDHAIR: Object to the form. Go ahead. 16 THE WITNESS: No. 17 BY MR. BRAVE: 18 Q. Please name every person in the securities 19 industry you have communicated with since January, 2004? 20 Communications include verbal, telephonic, electronic, 21 FAX and mail if there have been any. 22 A. There haven't been any. 23 Q. The same question for reporters. Name every 24 reporter that you have communicated with since January, 25 2004? Communications include verbal, telephonic,</p>
<p style="text-align: right;">Page 139</p> <p>1 maintaining the reports for Prepaid Legal, making sure 2 that the calls were being answered timely, watching the 3 document room, making sure that the files were filed 4 accordingly, word processing. It wasn't a traditional 5 law firm. 6 Q. How many lawyers were in that office? 7 A. When the law firm closed I believe there were 8 22 to 25. 9 Q. Who was your immediate supervisor? 10 A. Mike Fuller. 11 Q. How well did you get along with Mr. Fuller? 12 A. Pretty well. 13 Q. When was the last time you've been in contact 14 with Mr. Fuller? 15 A. It's been a few years. I've seen him at the 16 mall at Christmas time and he wished me a merry 17 Christmas and that's it. 18 Q. Who was head of the Parker Stanbury law firm? 19 A. They were out of California. It was Robert 20 Lopresti and Ron Smith. 21 Q. What was -- how was your relationship with 22 both of them? 23 A. I really didn't know Ron Smith that well. 24 And Mr. Lopresti and I got along very well, pretty well. 25 Q. When is the last time you've seen either one</p>	<p style="text-align: right;">Page 141</p> <p>1 electronic, FAX and mail. Have there been any? 2 A. No. 3 Q. The same question with analysts. Did you 4 ever communicate with any analyst other than to direct 5 phone calls or to take messages? Communications in this 6 case means disseminating company information, the 7 company being Taser, verbally, electronically, 8 telephonic, FAX or e-mail. 9 A. No, not to my knowledge. 10 Q. Isn't it true that there was about a dozen 11 analysts who called on your direct line at Taser and 12 asked for you by name at least immediately after you 13 resigned? 14 A. I wouldn't know that. 15 Q. Could you explain why that might happen? 16 MR. REDHAIR: Object to the form. 17 THE WITNESS: Well, probably because I 18 reported to Rick Smith and that was actually Rick 19 Smith's direct line when I first started and whenever I 20 answered my phone I could actually answer my phone "Rick 21 Smith's office. This is Pam." But why they would call 22 me direct I have no idea other than that reason. 23 BY MR. BRAVE: 24 Q. While you were employed at Taser did you have 25 any co-workers that you socialized with outside of the</p>

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<p style="text-align: right;">Page 142</p> <p>1 company?</p> <p>2 A. You mean having a beer with them or</p> <p>3 something?</p> <p>4 Q. Just anything outside of work.</p> <p>5 A. No.</p> <p>6 Q. What is your relationship with Bonnie</p> <p>7 O'Malley?</p> <p>8 A. She was a -- one of my staff at Parker</p> <p>9 Stanbury. She was a secretary there.</p> <p>10 Q. When did you first meet Bonnie?</p> <p>11 A. We met at Albertson's when we worked together</p> <p>12 at the Albertson's regional office. She was also an</p> <p>13 administrative assistant at Albertson's.</p> <p>14 Q. What kind of time-frame would that be?</p> <p>15 A. Probably I think she came on to</p> <p>16 Albertson's -- I don't recall the date, but I believe</p> <p>17 she came into our group in 2001 maybe, the latter part</p> <p>18 of. I don't recall. I know that it was before I had</p> <p>19 gone to Parker Stanbury.</p> <p>20 Q. Did you work with Bonnie O'Malley anywhere</p> <p>21 other than Albertson's and Taser?</p> <p>22 A. At Parker Stanbury. She was a secretary</p> <p>23 there.</p> <p>24 Q. Anyplace else?</p> <p>25 A. No.</p>	<p style="text-align: right;">Page 144</p> <p>1 A. Uh-huh.</p> <p>2 Q. -- do you know the time-frame I'm referring</p> <p>3 to?</p> <p>4 A. Yes.</p> <p>5 Q. Did you have any discussions or conversations</p> <p>6 with Bonnie O'Malley regarding anything related to the</p> <p>7 leaks or anything around those accusations or facts?</p> <p>8 A. Not that I recall.</p> <p>9 Q. Is there anything that would help you recall?</p> <p>10 A. No, because I would not have contacted her.</p> <p>11 Q. Do you have a friend or a person who's been a</p> <p>12 co-worker in the past that you have been relatively</p> <p>13 close to by the name of Debbie?</p> <p>14 A. Debbie?</p> <p>15 Q. Along the same line of questioning as</p> <p>16 Ms. O'Malley, something along those lines?</p> <p>17 A. I had a Debbie that worked at Parker Stanbury</p> <p>18 as a receptionist but I wouldn't say that she was my</p> <p>19 friend or anything. She was my receptionist at Parker</p> <p>20 Stanbury.</p> <p>21 Q. What was Debbie's full name?</p> <p>22 A. Debbie Thompson.</p> <p>23 Q. Was she with you at -- was Debbie Thompson</p> <p>24 with you at any other location or any other place of</p> <p>25 employment?</p>
<p style="text-align: right;">Page 143</p> <p>1 Q. Did you both move to Phoenix about the same</p> <p>2 time?</p> <p>3 A. I have no idea when she moved to Phoenix.</p> <p>4 Q. Who got the first job at Albertson's, either</p> <p>5 yourself or Bonnie?</p> <p>6 A. I -- I don't know. I know I was at the</p> <p>7 Albertson's regional office when she appeared, so I</p> <p>8 guess I would have. I don't know.</p> <p>9 Q. Did you help Bonnie O'Malley get a job at</p> <p>10 Albertson's?</p> <p>11 A. No.</p> <p>12 Q. Was Bonnie O'Malley accused of any misdeeds</p> <p>13 or inappropriate behavior at Parker Stanbury?</p> <p>14 A. Not to my knowledge.</p> <p>15 Q. Who came to Taser to be employed first,</p> <p>16 yourself or Bonnie O'Malley?</p> <p>17 A. Myself.</p> <p>18 Q. Did you assist Bonnie in coming to work or</p> <p>19 going to work at Taser?</p> <p>20 A. Yes. I -- I told her of a position and I</p> <p>21 knew that she was in need of a position because of the</p> <p>22 closing of the law firm so I did, you know, I told her</p> <p>23 of a position there.</p> <p>24 Q. Back when Taser was investigating the leaks</p> <p>25 back in January, early January, 2007 --</p>	<p style="text-align: right;">Page 145</p> <p>1 A. She came on to Taser as well.</p> <p>2 Q. After you did or before you did?</p> <p>3 A. After I did.</p> <p>4 Q. Have you had any contact with her since your</p> <p>5 departure from Taser on January 27, 2005?</p> <p>6 A. No.</p> <p>7 Q. At Taser in January of 2005 and the end of</p> <p>8 December, 2004 where was your normal seat and desk</p> <p>9 located in relationship to the main company FAX machine?</p> <p>10 A. It was around -- there was a wall that</p> <p>11 separated me from the FAX.</p> <p>12 Q. So approximately how far was it?</p> <p>13 A. Well, there were -- let me clarify that</p> <p>14 because there were actually two different FAX machines</p> <p>15 because there was one that was as you walk in the</p> <p>16 door -- you walk in the door, there was a receptionist</p> <p>17 and you kind of made a little bit of a left turn and</p> <p>18 there was a hallway and there was a FAX that sat in that</p> <p>19 hallway and you had to go around the corner and then I</p> <p>20 sat on the other side of the wall from that FAX. And</p> <p>21 then there was also another FAX machine that was down by</p> <p>22 the restrooms that was a little way's away.</p> <p>23 Q. Was it part of your duties to include</p> <p>24 collecting FAXes off those FAX machines?</p> <p>25 A. If I saw FAXes there I would collect them.</p>

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<p style="text-align: right;">Page 146</p> <p>1 Q. Was it part of your duties to answer outside 2 telephone calls?</p> <p>3 A. Yes.</p> <p>4 Q. Did you produce Taser investor packets from 5 your home?</p> <p>6 A. With an approval from Doug or Rick.</p> <p>7 Q. What computer access did you have to 8 confidential Taser information? Could you access all 9 the drives in the computer network system?</p> <p>10 MR. REDHAIR: Object to form.</p> <p>11 THE WITNESS: At my desk, yes. Well, there 12 were -- I'm sure there were some drives that I couldn't 13 get to that were strictly for the officers.</p> <p>14 BY MR. BRAVE:</p> <p>15 Q. Did you check e-mails for Rick Smith?</p> <p>16 A. Eventually, yes. Not at first I did not.</p> <p>17 Q. Did you check e-mails for Tom Smith?</p> <p>18 A. No.</p> <p>19 Q. Did you check e-mails for Doug Klint?</p> <p>20 A. At one point I did.</p> <p>21 Q. Approximately when was that and for what 22 period of time?</p> <p>23 A. Doug was actually earlier than Rick and it 24 would have been a few months after my hire up until the 25 time I left.</p>	<p style="text-align: right;">Page 148</p> <p>1 information and looking.</p> <p>2 Q. What kind of a part-time job would that have 3 been?</p> <p>4 A. It could have been anything from retail to 5 cleaning offices.</p> <p>6 Q. Anything else other than that?</p> <p>7 A. No, unh-unh.</p> <p>8 Q. Since January 1st of 2004 did you -- 9 rephrase -- no, that's fine. Since January 1, 2004 were 10 you ever employed or retained in any way or form in the 11 broadest possible sense with any kind after law firm, 12 legal entity or attorney?</p> <p>13 A. Since January of 2004?</p> <p>14 Q. Yes.</p> <p>15 A. Yes, I worked at Prepaid Legal.</p> <p>16 Q. Anywhere else for anyone else?</p> <p>17 A. No, no.</p> <p>18 Q. Do you know a Dawn Gilbertson?</p> <p>19 A. No.</p> <p>20 Q. Do you know a Robert -- when I say "do you 21 know" what I mean is have you ever had any contacts with 22 in the broadest possible sense including e-mails, 23 communication, telephone calls, et cetera.</p> <p>24 Robert Englund?</p> <p>25 A. I know the name, but I don't -- I don't --</p>
<p style="text-align: right;">Page 147</p> <p>1 Q. Did you check any e-mails for Phil Smith?</p> <p>2 A. Yes.</p> <p>3 Q. Did you have any of their passwords?</p> <p>4 A. Not to my knowledge. I don't recall ever 5 having anybody's passwords.</p> <p>6 Q. If you didn't have their passwords, how did 7 you check their e-mail?</p> <p>8 A. It was a shared -- they gave me the access, 9 you know, the -- what's the word for it -- they 10 designated me to be the one in their e-mail. It would 11 actually come through my -- my Outlook.</p> <p>12 Q. Were you employed by -- did you work for or 13 did you have any other kind of independent contracts or 14 employee relationship in the broadest possible sense 15 with any other person or entity other than Taser 16 International during your time at Taser which would have 17 been from March 4, 2004 until January 27, 2005?</p> <p>18 MR. REDHAIR: Object to the form.</p> <p>19 THE WITNESS: I probably -- I could have had 20 a part-time job because I'm always working part-time 21 jobs, but I don't recall.</p> <p>22 BY MR. BRAVE:</p> <p>23 Q. Is there anything that would refresh your 24 memory?</p> <p>25 A. By going back into my -- my financial</p>	<p style="text-align: right;">Page 149</p> <p>1 I've never spoke to him.</p> <p>2 Q. Have you ever had any communications to him 3 or from him in any way?</p> <p>4 A. No.</p> <p>5 Q. Okay. Again this applies to this list I'm 6 going to go down. The question is not whether you know 7 who the person is --</p> <p>8 A. Okay.</p> <p>9 Q. -- but whether or not you've had any 10 communications of any type either directly or indirectly 11 or through some third party.</p> <p>12 A. Okay.</p> <p>13 Q. Thor Valdmanis of USAToday?</p> <p>14 A. Again I don't recall the name.</p> <p>15 Q. So that -- so, therefore, you did not have 16 any communications with him?</p> <p>17 MR. REDHAIR: Object to form.</p> <p>18 THE WITNESS: I truly don't recall. I had 19 several people calling when I worked at Taser. There 20 were several people that would call my line to speak 21 with Rick Smith, so I don't -- I really don't recall 22 their names, all of them.</p> <p>23 BY MR. BRAVE:</p> <p>24 Q. Outside of that, did you have any 25 communications in any way, shape or form with him?</p>

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<p style="text-align: right;">Page 150</p> <p>1 A. No. 2 Q. Alex Barenson? 3 A. No. 4 Q. J. Carr Bettis? 5 A. No. 6 Q. Anybody at Gradient Analytics? 7 A. No. 8 Q. Don Vickery? 9 A. No. 10 Q. Rob Macelli? 11 A. No. 12 Q. Anyone else at Gradient? 13 A. No. 14 Q. Law firms; Milberg Weiss? 15 A. No. 16 Q. Law firm, Lorach Coughlin? 17 A. No. 18 Q. Any other law firm other than Parker 19 Stanbury? 20 A. No. 21 Q. Any investment bankers? 22 MR. REDHAIR: Object to form. What is the 23 relevance of this to the case that she's here to 24 discuss? 25 MR. BRAVE: It's real simple. If she had</p>	<p style="text-align: right;">Page 152</p> <p>1 A. No. 2 Q. And who approved you to do that? 3 A. Doug Klint. 4 Q. Did you cause any Taser company documents, 5 paper or electronic, to be removed or transferred to any 6 other computer other than at Taser or the one computer 7 at your home that you just mentioned for the volunteer 8 exposure spreadsheet? 9 A. No. 10 Q. Did you cause any Taser company documents, 11 paper or electronic, to be removed to any outside third 12 parties other than what you just discussed? 13 A. No. 14 Q. At Taser International did you handle the 15 facsimile from the Securities and Exchange Commission on 16 December 23, 2004? 17 A. I don't recall. I don't recall a FAX. I 18 mean, I don't remember what FAXes came through or what 19 documents they were. 20 Q. Is there anything that would refresh your 21 memory on that specific question? 22 A. Not necessarily. I just -- it was three or 23 four years ago. I don't recall. 24 Q. Did you in that same period late December 25 2004, early January, 2005, did you handle a letter to</p>
<p style="text-align: right;">Page 151</p> <p>1 some kind of a financial interest in this or she did act 2 in any way to cause a very large demise of the Taser 3 stock back in 2005, then therefore she has ulterior 4 motives and bias in what she is saying here today and 5 that's a reasonable assumption based on what we know. 6 So, therefore, I'm just asking the broadest possible 7 questions. If the answer is no, you notice I'm not 8 going any further, but I'm entitled to ask these simple 9 questions. 10 Q. Investment bankers? 11 A. No. 12 Q. Hedge fund managers? 13 A. No. 14 Q. Stockbrokers? 15 A. No. 16 Q. Any other journalists? 17 A. No. 18 Q. Did you cause any Taser company documents, 19 paper or electronic, to be removed to your house? 20 A. With approval, yes. 21 Q. And what documents would those have been? 22 A. It was actually the spreadsheet. 23 Q. Long-term exposure spreadsheet? 24 A. Yes, sir. 25 Q. Anything else?</p>	<p style="text-align: right;">Page 153</p> <p>1 Doug Klint from the Securities and Exchange Commission? 2 A. If I did I would have handed it to Doug 3 Klint. 4 Q. Do you have any recollection as you sit here 5 today of any letter such as that? 6 A. I don't recall. 7 Q. Do you have any recollection of opening such 8 a letter? 9 A. I do recall getting an envelope only because 10 of remembering the envelope and I gave it to Doug. 11 Q. Is there anything else that would provide 12 additional refreshment to your recollection regarding 13 that letter and/or its opening? 14 A. No. 15 Q. Did you lie about opening the letter, the SEC 16 letter when asked by investigators Click and Robinson? 17 MR. REDHAIR: Object to form. 18 THE WITNESS: No, I did not lie. I just was 19 confused when they were questioning me. 20 BY MR. BRAVE: 21 Q. Were all these Securities and Exchange 22 Commission letters in a file locked in your desk drawer? 23 A. They were in my desk drawer because that's 24 where I was told to put them. 25 Q. Were the company calendars kept in your work</p>

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<p style="text-align: right;">Page 154</p> <p>1 space?</p> <p>2 A. In my computer.</p> <p>3 Q. While you were at work at Taser on December</p> <p>4 30th of 2004 did you handle an order that was in</p> <p>5 relationship to DGG?</p> <p>6 A. No.</p> <p>7 Q. D David, G George, G George. That's the name</p> <p>8 of the company.</p> <p>9 Did you know of a January, 2005 meeting with</p> <p>10 the Arizona Attorney General and members of Taser?</p> <p>11 A. No. I -- I vaguely know that it was on the</p> <p>12 calendar but I didn't know what it was for.</p> <p>13 Q. Did you schedule that meeting?</p> <p>14 A. I don't recall if I actually scheduled it or</p> <p>15 not.</p> <p>16 Q. Is there anything that would refresh your</p> <p>17 memory?</p> <p>18 A. No, other than if somebody said I did. I --</p> <p>19 but I do not recall actually scheduling it. I don't</p> <p>20 know.</p> <p>21 Q. If someone said you did schedule it would</p> <p>22 have any basis to dispute that?</p> <p>23 A. No.</p> <p>24 Q. Did you tell anyone outside of Taser's</p> <p>25 executive team about the meeting regarding the Arizona</p>	<p style="text-align: right;">Page 156</p> <p>1 Taser documents to your personal e-mail account?</p> <p>2 A. There were a few things that were public that</p> <p>3 were, you know, clips of, you know, where it was, for</p> <p>4 instance, if it saved somebody or, you know, an article</p> <p>5 that was public knowledge that I wanted to watch at</p> <p>6 home, just to watch the -- the clip.</p> <p>7 Q. Anything else?</p> <p>8 A. No.</p> <p>9 Q. Did you have a key to the office in December,</p> <p>10 2004 and January 2005?</p> <p>11 A. Yes.</p> <p>12 Q. On January 27, 2005 why did you resign or</p> <p>13 provide a resignation to the detectives who were</p> <p>14 interviewing you?</p> <p>15 MR. REDHAIR: Object to form. Go ahead.</p> <p>16 THE WITNESS: Because they basically told me</p> <p>17 that was the best thing for me to do, so they gave me a</p> <p>18 little -- they ripped out a piece of paper and I wrote</p> <p>19 down something and that was that.</p> <p>20 BY MR. BRAVE:</p> <p>21 Q. If both of those investigators state that you</p> <p>22 brought your statement of resignation with you, would</p> <p>23 you have any basis to dispute that or disprove that?</p> <p>24 A. Yes, I would.</p> <p>25 Q. And what would that be?</p>
<p style="text-align: right;">Page 155</p> <p>1 Attorney General in January, 2005?</p> <p>2 A. No. I had no reason to. I didn't even know</p> <p>3 what it was for.</p> <p>4 Q. Did you have access to the Taser confidential</p> <p>5 stock grant ledger in January of '05?</p> <p>6 A. No. I don't even know what that is.</p> <p>7 Q. Did you disclose stock grant information for</p> <p>8 one to four police officers to Thor Valdmanis in late</p> <p>9 2004 or January, 2005?</p> <p>10 A. No.</p> <p>11 Q. Did you have access to the confidential Taser</p> <p>12 training bulletins?</p> <p>13 A. The training bulletins?</p> <p>14 Q. Yes.</p> <p>15 A. I don't recall if I did or not. To be honest</p> <p>16 with you, I don't recall.</p> <p>17 Q. Did you cause a September, 2004 training</p> <p>18 bulletin or any other to go to Alex Barenson of the New</p> <p>19 York Times or to any other person outside of Taser?</p> <p>20 A. Absolutely not.</p> <p>21 Q. Did you copy any files from your computer at</p> <p>22 Taser?</p> <p>23 A. No.</p> <p>24 Q. Other than the Volunteer Exposure Report that</p> <p>25 you've already testified to, did you e-mail any of the</p>	<p style="text-align: right;">Page 157</p> <p>1 A. Because that's not what happened. They --</p> <p>2 they told me in the meeting that that would be the best</p> <p>3 thing to do and they basically intimidated me into</p> <p>4 thinking that was the best thing to do, so I did that</p> <p>5 with them sitting at their present -- they handed me the</p> <p>6 piece of paper and a pen. I wrote it out and that was</p> <p>7 the end of the story.</p> <p>8 Q. Have you ever provided in the broadest</p> <p>9 possible context any Taser confidential information to</p> <p>10 any attorneys or anyone working on their behalf that you</p> <p>11 know of that wasn't specifically delegated to you by one</p> <p>12 of the Taser executives?</p> <p>13 A. No.</p> <p>14 Q. Are you paying for your own counsel here</p> <p>15 today?</p> <p>16 A. Yes, I am.</p> <p>17 Q. Are you being reimbursed in any way for</p> <p>18 payment of this counsel?</p> <p>19 A. No.</p> <p>20 (Deposition Exhibit Number 23 was</p> <p>21 then marked for identification.)</p> <p>22 MR. REDHAIR: Is this Exhibit 3?</p> <p>23 MR. BRAVE: No. Actually we've marked a</p> <p>24 bunch while you were out.</p> <p>25 MR. REDHAIR: What number?</p>

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<p style="text-align: right;">Page 158</p> <p>1 MR. BRAVE: 23.</p> <p>2 Q. Ms. Schreiner, I'm showing you what's been 3 marked as Exhibit Number 23. Would you identify that? 4 Do you identify that document?</p> <p>5 A. Yes.</p> <p>6 Q. Is that the Taser Employment, Confidential 7 Information, Invention Assignment and Arbitration 8 Agreement?</p> <p>9 A. Yes.</p> <p>10 Q. On page 6 is that your signature?</p> <p>11 A. Yes.</p> <p>12 Q. Is there anything on -- and on page 7?</p> <p>13 A. Yes.</p> <p>14 Q. Is there anything on this document sitting 15 before you that you do not believe is accurate or 16 correct or a correct copy of the document you signed 17 back in March of 2004?</p> <p>18 MR. REDHAIR: Object to the form.</p> <p>19 THE WITNESS: No. (Deposition Exhibit Number 24 was then marked for identification.)</p> <p>22 BY MR. BRAVE:</p> <p>23 Q. Ms. Schreiner, I'm showing you what has been 24 marked as Exhibit 24. Do you recognize that as a copy 25 of what?</p>	<p style="text-align: right;">Page 160</p> <p>1 Q. And did you receive this before or after 2 providing the note of resignation which was Exhibit 3 Number 24?</p> <p>4 A. After.</p> <p>5 Q. Do you have any reason to believe that this 6 is not true, accurate and complete?</p> <p>7 A. No.</p> <p>8 Q. You previously testified that you asked Rick 9 Smith for a loan in, I believe it was June of 2004, is 10 that correct?</p> <p>11 A. Yes.</p> <p>12 Q. What was that loan for?</p> <p>13 A. It was to pay some medical bills.</p> <p>14 Q. And what did Rick Smith do in response to 15 your request?</p> <p>16 A. He gave me a check.</p> <p>17 Q. A company check or personal check or some 18 other check?</p> <p>19 A. Company.</p> <p>20 Q. And was it a loan or what was it?</p> <p>21 A. Not -- to my knowledge it was not a loan.</p> <p>22 Q. Okay. Now, you testified on October 18, 2007 23 that it was a loan, so what makes you think now it's not 24 a loan?</p> <p>25 A. Because I haven't repaid it, so, therefore,</p>
<p style="text-align: right;">Page 159</p> <p>1 A. Uh-huh.</p> <p>2 Q. What is that document?</p> <p>3 A. That was the letter that I wrote with one of 4 the detectives.</p> <p>5 Q. And just to be clear, you did not bring this 6 with you to the interview; you wrote it at the 7 interview, is that what you're saying?</p> <p>8 A. Yes I did. I wrote that at the interview.</p> <p>9 Q. And is this an accurate complete and complete 10 copy as far as you know?</p> <p>11 A. It is a copy, uh-huh.</p> <p>12 Q. Do you have any reason to dispute its 13 authenticity?</p> <p>14 A. Well, I know that I wrote it, but --</p> <p>15 Q. You have no reason to believe it's been 16 modified or changed?</p> <p>17 A. No.</p> <p>18 (Deposition Exhibit Number 25 was 19 then marked for identification.)</p> <p>20 BY MR. BRAVE:</p> <p>21 Q. Ms. Schreiner, I'm handing you what has been 22 marked as Exhibit Number 25. Do you recognize that?</p> <p>23 A. Yes.</p> <p>24 Q. And what is that?</p> <p>25 A. That is a notice of my termination.</p>	<p style="text-align: right;">Page 161</p> <p>1 you know, to me it was not a loan.</p> <p>2 Q. So --</p> <p>3 A. So --</p> <p>4 Q. Go ahead. I'm sorry.</p> <p>5 A. So I'm not sure. You know, I was willing to 6 repay it. If I needed to repay it, I would have repaid 7 it.</p> <p>8 Q. Just to be clear, why did you testify on 9 October 18, 2004 that it was a loan?</p> <p>10 A. Because when I went to him I did ask him if 11 he could loan me some money.</p> <p>12 Q. I'm sorry. I screwed up on the date. Why 13 did you testify in your deposition in this room on 14 October 18th of 2007 that it was a loan?</p> <p>15 A. Because I just said because when I went to 16 him I did ask him if he could loan me the money and 17 maybe I was naive but I took it as a loan and I was 18 going to be more than happy or was very willing to repay 19 the loan.</p> <p>20 Q. I must not be precise. I apologize.</p> <p>21 What has happened between October 18, 2007 22 when you testified it was a loan to today when you say 23 it was not a loan?</p> <p>24 A. Nothing. I'm -- that's what I'm saying to 25 you is that I didn't -- I'm not saying that it's not a</p>

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<p style="text-align: right;">Page 162</p> <p>1 loan. I have not repaid the money to Rick. So I 2 myself, when I asked him for the money I did ask him for 3 it as a loan. I took it as a loan.</p> <p>4 Q. And to this day do you believe it was a loan?</p> <p>5 A. Well, yeah, I still do. And I, you know, 6 would be more than happy to repay it.</p> <p>7 (Deposition Exhibit Number 26 was 8 then marked for identification.)</p> <p>9 BY MR. BRAVE:</p> <p>10 Q. Ms. Schreiner, I'm showing you what has been 11 marked as Exhibit 26. Do you recognize that document as 12 a copy of something, and if so what?</p> <p>13 A. It's a check. I don't know what the second 14 sheet is. I haven't seen that. I don't know what that 15 is.</p> <p>16 Q. Could that be the withholding that was taken 17 out of the check?</p> <p>18 A. Possibly, but I don't know.</p> <p>19 Q. On the front of the page do you see where it 20 says "Invoice Number" and it says "Bonus"?</p> <p>21 A. Yes.</p> <p>22 Q. So, wouldn't that indicate that it was a 23 bonus check?</p> <p>24 A. Yes.</p> <p>25 Q. We've been talking about the shred bin, bin</p>	<p style="text-align: right;">Page 164</p> <p>1 A. I'm sorry. I really don't recall the dates. 2 Q. Are we talking the Securities and Exchange 3 Commission investigation?</p> <p>4 A. No. There were two different things going 5 on, you know, relatively -- either right around the same 6 time, back to back type thing. There was a DOJ and I 7 don't remember what it was called but it was something 8 to do with the DOJ, and then there was also the SEC. So 9 there were two separate incidences going on.</p> <p>10 Q. But you don't recall any of the exact dates 11 or specifics?</p> <p>12 A. No, I really don't.</p> <p>13 Q. Do you recall the name of the company that 14 provided the shred bins?</p> <p>15 A. No. I think it started with an A. 16 (Deposition Exhibit Number 27 was 17 then marked for identification.)</p> <p>18 BY MR. BRAVE:</p> <p>19 Q. I'm showing you what has been marked Exhibit 20 Number 27. Do you recognize that document?</p> <p>21 A. Not the -- not this, no.</p> <p>22 Q. Do you recognize the name Abco Recycling?</p> <p>23 A. It could be.</p> <p>24 Q. Do you have any reason to believe -- if I put 25 to you that it was Abco Recycling that provided the</p>
<p style="text-align: right;">Page 163</p> <p>1 or bins, that were brought in in late December of 2004, 2 early January, 2005.</p> <p>3 A. Uh-huh.</p> <p>4 Q. Do you recall exactly what date they were 5 brought into the office?</p> <p>6 A. No, I don't remember the date.</p> <p>7 Q. If I were to say to you that they were 8 brought in on December 29th of 2004 would you have any 9 argument or dispute with that?</p> <p>10 A. I would probably say it was earlier than 11 that.</p> <p>12 Q. Would you have any basis upon which to make 13 that assertion?</p> <p>14 A. Yeah. Because we were doing -- we were doing 15 preparation for all the different investigations and 16 things like that prior to that. So I -- but I couldn't 17 tell you the date. I just -- I think it was earlier 18 than that.</p> <p>19 Q. When are you saying you began doing the 20 preparations for the investigations?</p> <p>21 A. For the DOJ investigation or it wasn't -- it 22 was not a DOJ investigation. It was an informal 23 something or another. But that was -- that was some 24 time in December and I don't recall the dates, I mean.</p> <p>25 Q. I'm sorry?</p>	<p style="text-align: right;">Page 165</p> <p>1 shred bins, would you have any basis upon which to 2 dispute that?</p> <p>3 A. No. I couldn't dispute that because I really 4 don't recall the name of the company.</p> <p>5 Q. And if the owner of Abco Recycling states 6 that the very first date they delivered the shredding 7 bin was on December 29, 2007 do you have any specific 8 ability to dispute that?</p> <p>9 A. Yes because it's not December, 2007 yet.</p> <p>10 Q. You're absolutely correct.</p> <p>11 If the owner of Abco Recycling states that 12 based on their records they first provided the shredding 13 bin to Taser on December 29, 2004 would you have any 14 basis or proof upon which to dispute that?</p> <p>15 A. Well, I couldn't. I don't -- I don't recall 16 the date.</p> <p>17 Q. I'm showing you what has been marked as 18 Exhibit 13. That is the January -- that is a transcript 19 of the January 24, 2005 interview of you by Burt 20 Robinson and Tim Click. Okay?</p> <p>21 A. Okay.</p> <p>22 Q. If you will turn to page 21.</p> <p>23 A. Okay.</p> <p>24 Q. Line 24. Mr. "ROBINSON: "Let's, let's call 25 it what it is. You weren't truthful with us?"</p>

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<p style="text-align: right;">Page 166</p> <p>1 Next, "SCHREINER: Right, and I apologize. I 2 mean I -- I didn't give you..." 3 "ROBINSON: So we can agree that was 4 untruthful at the time?" 5 "SCHREINER: Yes, right, correct and I that 6 did something wrong." Is that what it says? 7 MR. REDHAIR: Where are you reading? 8 MS. JOHNSON: Excuse me. What page are you 9 on? 10 MR. BRAVE: 21. 11 MR. REDHAIR: I thought you said 22. I 12 apologize. 13 MR. BRAVE: Sorry. 14 Q. So, therefore, according to this you admitted 15 that you were untruthful with them, correct? 16 MR. REDHAIR: Object to form. I don't see 17 where you're reading. 18 MS. JOHNSON: I don't either. 19 MR. BRAVE: Line 24. "ROBINSON: Let's, 20 Let's call it what it is. You weren't truthful with 21 us?" 22 MS. JOHNSON: That's not on page 21. Do you 23 have a page number again? 24 MR. BRAVE: Page 21 is what I have on the 25 bottom.</p>	<p style="text-align: right;">Page 168</p> <p>1 MR. REDHAIR: Object to form. 2 THE WITNESS: It does say that but there were 3 things leading up to that because I was confused in what 4 they were asking me and that is why I said what I said. 5 BY MR. BRAVE: 6 Q. Turn to page 56, please, lines 35 through 38. 7 Investigator "CLICK: You lied to us straight out. 8 "SHREINER: I know... and I did that in my 9 mind unintentionally because I'm scared." Did I read 10 that correctly? 11 MR. REDHAIR: Object to form. 12 THE WITNESS: Okay. 13 BY MR. BRAVE: 14 Q. I am showing you what has been marked Exhibit 15 14, which is the January 27th interview transcript with 16 the same investigators. 17 MR. REDHAIR: We were just reading from what 18 exhibit? 19 THE WITNESS: 13. 20 MR. REDHAIR: So the one -- 21 MR. BRAVE: We are now going to 14. 22 MR. REDHAIR: And that's this one? 23 MR. BRAVE: The one that says January 27, 24 2005 on it. 25 MS. JOHNSON: Is 14.</p>
<p style="text-align: right;">Page 167</p> <p>1 MS. GIBEAUT: I think there's two 2 transcripts. 3 MR. BRAVE: Yes, there's two transcripts. 4 This one is on January 24th. 5 MS. JOHNSON: Before you go any further I am 6 going to impose an objection to all the documents 7 including 23, 26, 27 -- what did you say this was? 8 Exhibit 13 is the first transcript or the second 9 transcript? 10 MR. BRAVE: 14. 11 MS. JOHNSON: 14. 12 MR. REDHAIR: And you're reading from Exhibit 13 13? 14 MS. JOHNSON: 14. 15 MR. BRAVE: 13. 16 MS. JOHNSON: My objection is that none of 17 these documents have been produced in discovery. It's 18 the first time they've been provided. And to that I 19 would object to the use in this deposition of documents 20 that were not produced in discovery as they should have 21 been. 22 BY MR. BRAVE: 23 Q. You can answer. The question is do lines 24 24 through 31 state you were not truthful with the 25 investigators?</p>	<p style="text-align: right;">Page 169</p> <p>1 BY MR. BRAVE: 2 Q. Turn to page 8. Between lines 3 and 4, 3 "SCHREINER," says, "I knew that, that not telling you 4 guys the truth about the envelopes, that was wrong of 5 me." Did I read that correctly? 6 A. Uh-huh. 7 MR. REDHAIR: Object to form. 8 MR. BRAVE: What's your objection to the 9 form? 10 MR. REDHAIR: I don't know that she's ever 11 seen this. I don't know what context it's in. I don't 12 know if she does. 13 MR. BRAVE: My question was whether I read it 14 correctly. She answered "yes." 15 THE WITNESS: But I have not seen this. 16 MR. REDHAIR: Let's take a quick break. 17 MR. BRAVE: Sure. 18 MR. KYLER: We're going off the record. The 19 time is 2:42. This ends tape 2 in the deposition of Pam 20 Schreiner. 21 (Short recess.) 22 MR. KYLER: We're back on the record. The 23 time is 2:54. 24 This begins tape 3 in the deposition of Pam 25 Schreiner.</p>

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<p style="text-align: right;">Page 170</p> <p>1 BY MR. BRAVE:</p> <p>2 Q. Ms. Schreiner, I'm showing you what has been 3 marked Exhibit 20. I will put to you that that is a 4 condensed copy of your transcript from your October 18, 5 2007 deposition?</p> <p>6 MR. KYLER: I'm sorry. Can everybody put 7 their microphones on?</p> <p>8 MR. BRAVE: Did you get that?</p> <p>9 Q. Have you seen this before?</p> <p>10 A. Yes. I'm sorry.</p> <p>11 Q. Just so you know, I'm not wasting time. I'm 12 just getting anything that's been asked and answered 13 today, I'm ignoring.</p> <p>14 Turn to page 16, which is deposition pages 58 15 to 61. It's deposition page 60. That will be easier.</p> <p>16 MR. REDHAIR: And then page 60 we are looking 17 for?</p> <p>18 MR. BRAVE: Yes.</p> <p>19 THE WITNESS: Okay.</p> <p>20 BY MR. BRAVE:</p> <p>21 Q. When talking about the science -- the Taser 22 scientific and medical advisory board you stated that 23 you knew that Doctor Kroll and Matt Brady were members 24 of that board, is that correct?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 172</p> <p>1 was the purpose of that, what it was for?</p> <p>2 A. To pay medical bills.</p> <p>3 Q. Just so you know, based upon prior telling 4 your client not to answer questions regarding medical 5 and/or financial, I'm skipping those just for the 6 record.</p> <p>7 You can set that aside. I'm not going to go 8 through most of those, but I will explain what they are 9 just for the record and then objections can be made.</p> <p>10 This is Exhibit 21, which is a transcript of 11 the Pam Schreiner deposition in the Powers trial, or the 12 Powers case on May 25, 2005.</p> <p>13 MR. REDHAIR: What number was that?</p> <p>14 MR. BRAVE: That's number 21.</p> <p>15 Also Exhibit Number 22 is a CD that has every 16 one of these documents on it in PDF format.</p> <p>17 Exhibit Number 3 are the two letters that you 18 brought this morning, counsel.</p> <p>19 MS. JOHNSON: I thought we already attached 20 23.</p> <p>21 MR. BRAVE: I'm sorry. Number 3. Sorry.</p> <p>22 MS. JOHNSON: Number 3.</p> <p>23 MR. BRAVE: Let's go off the record for a 24 minute. You can keep the video running, that's fine. 25 (Discussion off the record.)</p>
<p style="text-align: right;">Page 171</p> <p>1 Q. Do you recall -- and also Rick Smith?</p> <p>2 A. Uh-huh.</p> <p>3 Q. Do you recall any other members of that 4 board?</p> <p>5 A. There were some other ones. I just -- I 6 don't really remember their names. I just remember 7 there were others on the board.</p> <p>8 Q. So the only three specific ones you remember 9 are Mark Kroll, Matt Brady and Rick Smith that were on 10 the scientific and medical advisory board?</p> <p>11 A. Yes. To my knowledge, yes.</p> <p>12 Q. Farther down on the page on page 60 and 61 13 you stated that the scientific and medical advisory 14 board members received stock options?</p> <p>15 A. Uh-huh.</p> <p>16 Q. Do you know how many of those stock options 17 they received?</p> <p>18 A. No, I don't.</p> <p>19 Q. But you're certain they did receive the stock 20 options?</p> <p>21 A. That was my -- my belief, yes.</p> <p>22 Q. Going back to that check from a few moments 23 ago called a bonus --</p> <p>24 A. Uh-huh.</p> <p>25 Q. -- what was -- what did you tell Rick Smith</p>	<p style="text-align: right;">Page 173</p> <p>1 MR. BRAVE: It's either number 15 or 17 it 2 says "Alphagraphics" at the top, just like this. Got 3 it. Number 15. Back on the record.</p> <p>4 Q. Ms. Schreiner, I'm showing you what has been 5 marked as Exhibit Number 15. Do you recognize that 6 document?</p> <p>7 A. Possibly.</p> <p>8 Q. What do you possibly think it is?</p> <p>9 A. It looks like an invoice.</p> <p>10 Q. Regarding -- from who?</p> <p>11 A. Alphagraphics.</p> <p>12 Q. Regarding what?</p> <p>13 A. Copies that were made.</p> <p>14 Q. Copies of what that were made?</p> <p>15 A. Field reports.</p> <p>16 Q. And also these would have been the Volunteer 17 Exposure Reports that you had made into PDFs, is that 18 correct?</p> <p>19 A. I don't know. It says Field Reports, so I 20 don't know.</p> <p>21 Q. Do you have any reason to believe this -- 22 other than it says Field Reports that it was not 23 Volunteer Exposure Reports?</p> <p>24 A. I couldn't tell by looking at this. I'm 25 sorry.</p>

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<p style="text-align: right;">Page 174</p> <p>1 Q. That's fine. 2 I'm showing you what has been marked Exhibit 3 16. Do you recognize that document? 4 A. Again it's an invoice. 5 Q. From Alphagraphics? 6 A. Yes. 7 Q. Again for Field Reports is what it states? 8 A. Correct. And also some other type file. 9 Q. But other than that you really don't know 10 what it pertains to for this? 11 A. Yeah. I can't tell. 12 MR. BRAVE: Okay. Just for the record, 13 Exhibit 4 is the Volunteer Exposure Report spreadsheet 14 that Taser International currently has today, but ending 15 with dates January 30, 2005 with support material as it 16 pertains to injury reports that were found on that 17 spreadsheet. 18 MS. JOHNSON: I want to put on the record 19 that I have been asking for this since the beginning of 20 this case and it's never been produced. 21 MR. BRAVE: And I would also like to put on 22 the record that when Ms. Johnson was at the Taser months 23 ago she had access to the Taser human volunteer reports 24 and I know she spent time with them, I don't know how 25 much time.</p>	<p style="text-align: right;">Page 176</p> <p>1 exhibit? 2 MR. BRAVE: Yes. And you've got all of them 3 in your CD, every one of them. 4 MR. REDHAIR: Okay. I'm wondering -- I mean, 5 you've attempted to lay the foundation. Are you going 6 to ask her any questions about them? 7 MR. BRAVE: No. 8 MR. REDHAIR: Well, then I would object to 9 them being attached to the exhibit -- I mean, she hasn't 10 looked at them -- or I would object to them being 11 attached as exhibits to her deposition. She hasn't 12 looked at them, she doesn't know where they came from. 13 She has no knowledge whether they were complete when 14 they were done. So I think that's inappropriate, but -- 15 MR. BRAVE: Objection noted. 16 Exhibit 11 is a difference of 2 injuries from 17 the August 2, 2004 PDFs done by Alphagraphics and the 18 2001 listing of the volunteer Exposure spreadsheet. 19 MR. REDHAIR: Same objection. 20 MR. BRAVE: Continuing objection. 21 MR. REDHAIR: Okay. 22 BY MR. BRAVE: Good. 23 Exhibit 12 is the same thing except this one 24 is for the year 2002 and it is for PDFs that were on the 25 August 2, 2004 Alphagraphics PDFs that were made and the</p>
<p style="text-align: right;">Page 175</p> <p>1 MS. JOHNSON: Not with the spreadsheet. It 2 is an entirely different document. 3 MR. BRAVE: The spreadsheet has been 4 considered work-product until -- 5 MS. JOHNSON: Until today. 6 MR. BRAVE: Until today. 7 MS. JOHNSON: Thank you. 8 MR. BRAVE: Exhibit 5 is the same thing 9 except with a Taser computer network backup tape file 10 from January 5, 2005. 11 Exhibit 6 is the exact same thing except with 12 a computer backup date from tape of December 1, 2004. 13 Exhibit 7 is the same thing except with a 14 computer backup file that was backed up on November 19, 15 2004. 16 Exhibit 8 is the same thing except the 17 computer backup file was created on October 1, 2004. 18 Exhibit 9 is the same thing except it's a 19 computer backup from a file created on September 1, 20 2004. 21 And Exhibit 10 is the same thing except it's 22 computer backup from a file that was created and backed 23 up on July 31, '04. 24 MR. REDHAIR: Do you intend to attach these 25 to her exhibit -- I mean to her deposition as an</p>	<p style="text-align: right;">Page 177</p> <p>1 discrepancy between that and all of the spreadsheets. 2 It shows 16 more injuries. 3 MS. JOHNSON: Now all this is on this little 4 disc you have given me, is that correct? 5 MR. BRAVE: Everything is on that disc and 6 then some. 7 Q. Ms. Schreiner, I'm showing you what has been 8 marked as Exhibit 19, which you have never seen it 9 before. 10 A. No. 11 Q. I made it. I got it done about ten o'clock 12 last night. 13 MR. REDHAIR: What number? 14 THE WITNESS: 19. 15 BY MR. BRAVE: Just for the record, this is a 16 legal size table with some analysis -- with some 17 descriptions that is entitled Numerical Summary of TASER 18 Electronic Control Device Volunteer Exposure Reports 19 (VERs) August 2004 PDFs of VERs, Accidental Discharge/ 20 Injury Reports by TASER Training Instructors through 21 September 7, 2004 and VER Spreadsheets (VERS) through 22 January 30, 2005. Table created by Michael Brave, 23 National Litigation Counsel, TASER International, Inc. 24 (TASER) on December 2, 2007. Documents for analysis, 25 accumulated, organized and analyzed by Kelly Welz and</p>

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1 Brittany Montoya, TASER. Computer backup spreadsheet
 2 location, acquiring, and providing to Kelly Welz by Eric
 3 Rivera, R-I-V-E-R-A, and Ray Rivera.

4 Q. Ms. Schreiner, this is a breakdown of
 5 everything you see in those files in front of you.
 6 That's what I will assert to you.

7 And a couple things that I would like to
 8 point out is when you look at the third column from the
 9 left, which is the January 5, 2005 column, and you move
 10 backwards you'll notice that other than 2004 where it
 11 shows that there were additional entries made on the
 12 spreadsheet, all the other spreadsheet entries are
 13 identical.

14 MR. REDHAIR: Object to form.

15 MS. JOHNSON: I'm going to object to
 16 Mr. Brave testifying as a witness in this case and
 17 object to the question. I don't know how she could
 18 possibly answer a question that relates to a stack of
 19 documents that's at least a foot and a half high, a
 20 summary of which you're providing for the first time as
 21 Exhibit 19. That's my objection.

22 MR. BRAVE: That's fine. I'm actually
 23 providing it as a benefit to you two and not for any
 24 other reason.

25 Exhibit 17 is complete list of all the

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1 or was there some sort of thing going on in your
 2 personal life that they were investigating?

3 A. It was Taser.

4 Q. Okay. Was there anything other than your
 5 employment and work with Taser?

6 A. No.

7 Q. Okay. So when you said that, you know, the
 8 FBI and everybody was investigating you, is that what
 9 you meant?

10 A. I meant the Chandler police and I meant the
 11 FBI.

12 Q. Okay. You were shown Exhibit 13 and 14 which
 13 were transcriptions of interviews with some
 14 investigators?

15 A. Yes.

16 Q. And you were read certain portions of that
 17 and just little snippets of that interview. Do you
 18 recall that?

19 A. Yes.

20 Q. Did you lie to those investigators?

21 A. No.

22 Q. What -- what context was the statements that
 23 were made by the investigators that you were asked
 24 about? Explain that if you would.

25 A. If you actually read through the document

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1 injuries, of 135 of them, that were as of September 7th
 2 of '04.

3 MR. REDHAIR: What number is that?

4 THE WITNESS: 17.

5 MR. BRAVE: 17.

6 And Exhibit 18 is the same as that except
 7 using the date -- the end date of January 30, 2005.

8 MR. REDHAIR: And is that 18?

9 MR. BRAVE: Yes.

10 Take two minutes and I might be done.

11 MR. KYLER: We're going off the record. The
 12 time is 3:08.

13 (Short recess.)

14 MR. KYLER: We're back on the record. The
 15 time is 3:10.

16 MR. BRAVE: No further questions. Pass the
 17 witness.

18 MR. REDHAIR: I just want to clarify a couple
 19 issues.

20 EXAMINATION

21 BY MR. REDHAIR:

22 Q. You mentioned earlier in the deposition that
 23 you were investigated by the FBI.

24 A. Yes.

25 Q. Was that related to your employment at Taser

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1 itself going, you know, previous to those few lines that
 2 we were looking at, they were confusing me and I was
 3 confused in some things.

4 I did not intentionally tell the truth -- you
 5 know, I mean, not tell a lie. I was confused in things
 6 that they were asking me. And if you look back into
 7 some of the different things that they were saying to me
 8 and the way they were asking the question, it was just
 9 kind of off course and I was confused in dates and I was
 10 confused in maybe a color of an envelope or what the
 11 contents of that envelope were at the time of the
 12 investigation.

13 MR. REDHAIR: Okay. Okay. That's all I
 14 have.

15 MS. JOHNSON: No questions.

16 MR. BRAVE: Nothing further.

17 MR. KYLER: This concludes the deposition of
 18 Pam Schreiner and Videotape Number 3. We're off the
 19 record at 3:12.

20 (Whereupon, the deposition was then
 21 concluded at 3:12 p.m.)

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23

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25

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1 STATE OF ARIZONA)

) ss.

2 COUNTY OF MARICOPA)

3 BE IT KNOWN that the foregoing deposition was
4 taken before me, PAUL GROSSMAN, a Notary Public and
5 Certified Reporter #50028 in and for the County of
6 Maricopa, State of Arizona; that the witness before
7 testifying was duly sworn by me to testify to the whole
8 truth; pursuant to request, notification was provided
9 that the deposition is available for review and
10 signature; that the questions propounded to the witness
11 and the answers of the witness thereto were taken down
12 by me in shorthand and thereafter reduced to print by
13 computer-aided transcription under my direction; that
14 the foregoing 181 pages are a true and correct
15 transcript of all proceedings had upon the taking of
16 said deposition, all done to the best of my skill and
17 ability.

18 I FURTHER CERTIFY that I am in no way related
19 to any of the parties hereto, nor am I in any way
20 interested in the outcome hereof.

21 DATED at Phoenix, Arizona, this 5th day of
22 December, 2007.

23 _____
24 Paul Grossman, Notary Public
25 AZ CR #50028